



**Biotechnology Innovation Organization**  
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August 30, 2022

Mr. Kevin Allen  
Associate Director  
Arizona Department of Agriculture  
Weights and Measures Services Division  
1802 W. Jackson St., #78  
Phoenix, AZ 85007  
Submitted via email: [kallen@azda.gov](mailto:kallen@azda.gov)

**RE: BIO Comments on Proposed WMSD E15 Rule, RS-7**

Dear Mr. Allen:

I write on behalf of the Biotechnology Innovation Organization (BIO) – the world's largest biotechnology related trade group - in support of the Arizona Department of Agriculture's Weights and Measures Services Division's (WMSD) Proposed Rulemaking allowing for the sale of E15 throughout the state, reducing regulatory burdens for the regulated community, and increasing consumer choice.

As noted in the proposed rulemaking's preliminary summary of the economic, small business, and consumer impact, the proposal allows, but does not mandate, the sale of E15 in the Clean Burning Gasoline-covered area. E15 motor fuel is currently allowed in Arizona outside of the CBG-covered area.

Today, gasoline with 15 percent ethanol (E15) is offered at more than 2,600 retail locations across more than 31 states. Moreover, the vast majority of fuel dispensing equipment is already manufacturer-approved for E15. Furthermore, the National Renewable Energy Lab has found "the majority of installed tanks are compatible with E15" at refueling stations.

The U.S Environmental Protection Agency in 2011 approved E15 for use in light-duty conventional vehicles of model year 2001 and newer, including cars, light-duty trucks, medium-duty passenger vehicles, and all flex-fuel vehicles – which represents more than 96 percent of the cars and trucks on the road today - through a federal Clean Air Act waiver request, based on significant testing and research funded by the U.S. Department of Energy.

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E15 is seen as one of the most important near-term pathways to decarbonizing the transportation sector. To that end, ethanol emits 46% less greenhouse gas emissions than conventional gasoline, according to a recent study by Environmental Health and Energy, Inc. based on research from Harvard, Tufts, and more than two dozen other institutions. In addition to being better for public health and the environment, E15 is typically less expensive than regular unleaded gasoline.

In closing, BIO strongly supports this Arizona Department of Agriculture WMSD proposed regulation. We appreciate WMSD's consideration of these comments and encourage you to contact me at [gharrington@bio.org](mailto:gharrington@bio.org) or (202) 365-6436.

Sincerely,

Gene Harrington  
Director, State Government Affairs, Agriculture & Environment

cc: Mr. Jack Peterson, Arizona Department of Agriculture