



Motorcycle Riders Foundation

P.O. Box 250, Highland, IL 62249

(202) 546-0983 / mrfoffice@mrf.org / www.mrf.org

April 19, 2021

Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Docket ID No. EPA–HQ–OAR– 2020–0448

Request for Comment on “E15 Fuel Dispenser Labeling and Compatibility with Underground Storage Tanks”

Dear Administrator Regan,

On behalf of the Motorcycle Riders Foundation (MRF), thank you for the opportunity to submit comments regarding the proposed modification or elimination of the current requirement on fuel dispenser labels for gasoline-ethanol blends of greater than 10 volume percent ethanol and up to 15 volume percent ethanol (E15).

The MRF provides leadership at the federal level for state motorcyclists’ rights organizations as well as motorcycle clubs and individual riders. The MRF is chiefly concerned with issues at the national and international levels that impact the freedom and safety of American street motorcyclists. The MRF is committed to being a national advocate for the advancement of motorcycling and its associated lifestyle and works in conjunction with its partners to help educate elected officials and policymakers in Washington and beyond. As such, the MRF and its network of over 250,000 motorcyclists are compelled to offer the following comments.

The growing prevalence of E15 fuel in the United States is of concern to a diverse group of consumers. This fuel blend is problematic for engines and equipment in a wide variety of products including motorcycles, boats, lawnmowers, chainsaws, and snowmobiles. In fact, these higher blends are prohibited by the EPA for use in small displacement engines such as those listed above. Unfortunately, most consumers are not aware that these fuel blends may be



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causing damage to their product. A recent survey conducted by The Harris Poll found that over three in five consumers are unaware ethanol blends shouldn't be used in all vehicles.

In an effort to educate consumers and reduce misfuelling at the pump, guidelines were put into place requiring labels on pumps that dispensed E15. For nearly a decade a label has been required so consumers understand the appropriate and lawful use of E15. The federal government has led the way on protecting and educating consumers. However, this proposed rule; with a reduction in size and scope of the current label or the elimination of it all together would be a step backwards.

In fact, just this year the state of Indiana passed SB 303 that requires an additional warning label on E15 dispensing pumps. It is eye opening that an ethanol rich state like Indiana recognizes the need to educate consumers on E15. The federal government has led the way on this topic and states are now following suit.

We at the MRF are strong believers in the free market. However, in a free market the consumer must have the proper information about a product to make an informed decision. An educated consumer is in the best position to make the right decision for themselves. A warning label that is prominent and clearly visible to the user of a fuel dispenser creates a more educated consumers. In 2011, when the EPA first created the label requirement, the EPA understood this. Nothing has changed in the decade since.

Therefore, we respectfully ask that neither the proposed modification or elimination of the current E15 label be acted upon by the EPA. Removing or modifying this label would unnecessarily create confusion and would harm American consumers.

Sincerely,

Kirk R. Willard
President, Chairman of the Board
Motorcycle Riders Foundation