BRIGGS & STRATTON
CORPORATION

December 11, 2018

The Honorable John Shimkus
Chairman
U.S. House Energy and Commerce
Subcommittee on the Environment
Washington, DC 20510

The Honorable Paul Tonko
Ranking Member
U.S. House Energy and Commerce
Subcommittee on the Environment
Washington, DC 20510

Dear Chairman Shimkus and Ranking Member Tonko,

Thank you for holding today's hearing on the 21st Century Transportation Fuels Act and for allowing Briggs & Stratton to offer its perspective on the draft legislation.

There has been much discussion regarding the Renewable Fuel Standard (RFS) over the last few years and Briggs & Stratton has always tried to be a constructive participant in these stakeholder discussions. I appreciate the leadership you have shown and your willingness to hear from so many stakeholders. While I commend the Committee's work on the 21st Century Transportation Fuels Act, I am concerned that it does not do enough to protect small engine consumers or provide market certainty for small engine manufacturers like Briggs & Stratton. I would like to briefly outline several concerns and respectfully ask that you keep them in mind as the discussion on transportation fuel policy continues.

As you may know, Briggs & Stratton is the world's largest producer of small air-cooled gasoline engines for outdoor power equipment and we are a leading designer, manufacturer and marketer of power generation, pressure washer, lawn and garden, turf care and job site products. We are proudly headquartered in Milwaukee, Wisconsin and have U.S. manufacturing sites in New York, Georgia, Alabama, Missouri, Kentucky, Wisconsin and Nebraska. If you have a garage, you probably have a Briggs & Stratton product in it right now. Out of our 5,300 employees worldwide, approximately 86% of them are in the United States. We take pride in producing over 85% of our products, and 72% of our sales, here at home.

Briggs & Stratton's long-standing commitment to the environment remains a key focus for our business. We continue to manufacture our products with recycled materials that are highly efficient and with reduced emissions. Since 1995, we have reduced our emissions by 75%, and after completing the phase-in of our new product offering, achieved an additional 35% reduction in those emissions in January 2014. In 2007, we signed a pledge with the Department of Energy to reduce our energy consumption by 25% over 10 years. I am pleased to report that we met this goal. These are just a few of the many examples that demonstrate our commitment to the environment.

With that in mind, the goals underpinning the enactment of the RFS were laudable However, not only has it become apparent that the goals are unlikely to ever be met, the RFS and E15 ethanol content have resulted in significant unintended consequences for consumers

One particular concern with the octane standards contemplated in the 21st Century Transportation Fuels Act is that the amount of ethanol in the fuel blend can vary significantly and exceed 10% in order to deliver the target octane rating In order to balance performance and emissions, our carburetors (installed in both new and legacy equipment) are calibrated to handle an ethanol content of 0-10% Extensive research has shown that the use of ethanol blends above 10% in small non-road engines can have harmful and costly consequences, and the EPA has confirmed these findings Ethanol's inherent properties cause problems with small non-road engines, including higher operating temperatures, material corrosion, clogged carburetors, and reduced engine life

Small engines and outdoor power equipment are not designed, warranted, or EPA-approved to operate on gasoline containing more than 10% ethanol This is why we fully support the development of advanced biofuels as a solution. Biofuels from other feedstock are "drop-in fuels" Drop in fuels, by definition, meet existing gasoline specifications and are ready to "drop-in" to infrastructure, minimizing compatibility issues We have conducted extensive testing with a drop-in isobutanol blended gasoline which demonstrated evidence that such fuels can provide the performance and operational criteria necessary, without demonstrating any negative effects We strongly support further research into these alternative fuels that are effective and do not damage our products before introducing a new mandate in the Clean Air Act, which may make matters worse

The Department of Energy's testing of E-15 in non-road engines found that small engines experienced a variety of difficulties with higher ethanol blends More than half of the engines tested behaved "poorly" or "erratically" according to the DOE's report, which caused the EPA to exclude small engines from the E-15 waiver. However, this exclusion has not led to decreased problems due to consumer misfuelling

At Briggs & Stratton, we have partnered with other small engine manufacturers and retailers across the country to educate consumers on proper fueling We created the "Look Before You Pump" campaign to assist consumers when purchasing new small engine products While we are happy to do our part to educate the public on the negative impact high blends of ethanol can have in our products, we do not believe we should be solely responsible for this effort It is going to take a more concerted effort with industry and government to fully educate the public on the risks of misfueling To that end, we have been working with other like-minded industries, including the boating and motorcycle industries, to support H R 5855, the Consumer Protection and Fuel Transparency Act introduced by Rep Austin Scott, which would increase consumer education on ethanol fuel blends

Any policy changes to the RFS must first protect American consumers I encourage the Committee to work together in the 116th Congress in a bipartisan way to pursue policies that promote research into the next generation of renewable fuels that are proven safe on all types of engines

Sincerely,

Todd J. Teske
Chief Executive Officer and President
Briggs & Stratton