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February 23, 2022

Senate Education, Health &
Environmental Affairs Committee
2 West
Miller Senate Office Building
Annapolis, Maryland 21404

TRANSMITTED BY ELECTRONIC SUBMISSION

Re: Maryland S.686 - An Act concerning a Study on Environmental Impacts of Lead-based fuel use by the aviation industry.

Chairman Senator Pinsky and members of the Education, Health, and Environmental Affairs Committee,

The Aircraft Owners & Pilots Association is the world's largest aviation organization representing over 300,000 aircraft owners and pilots across the country, including 5,387 members in the state of Maryland. **AOPA supports the smart and safe transition to unleaded fuel and is leading the industry collaboration with the federal government to remove lead from aviation gasoline. Because this initiative will yield favorable results for all stakeholders in the foreseeable future, we OPPOSE the need for a state-funded study on the environmental impacts of lead-based fuel use by the aviation industry at this time.**

The general aviation industry includes more than 200,000 aircraft operating out of 5,000 public-use airports across the United States. The industry supports more than 1 million direct jobs and generates \$250 Billion in annual economic activity across the United States. Maryland is home to 2,195 aircraft spread across 35 public-use airports. According to the Maryland Aviation Administration study on Economic Impact of Public Use Airports In Maryland, the industry supports 9,929 jobs while generating \$867 Million in annual economic activity that produces \$131 Million in state and local tax revenue.

Removing lead from aviation fuels is the most pressing issue facing general aviation today.

Leaders representing major general aviation associations, petroleum industry stakeholders, and the U.S. government jointly announced on February 23 an ambitious initiative called EAGLE (*Eliminate Aviation Gasoline Lead Emissions*) to transition to lead-free aviation fuels for all piston-engine aircraft by the end of 2030.

EAGLE comprises a public-private partnership to expand and accelerate government and industry actions and investments and establish the policies and activities to permit aircraft to operate lead-free without compromising safety or economic health.

These industry leaders are asking state and local governments, general aviation associations, airports, fuel suppliers and distributors, and others to join in, "making EAGLE soar."

The EAGLE initiative calls for ensuring that aviation fuels available today remain in place until an unleaded solution is developed and deployed to our nation's airports. The industry's goal is FAA authorization for unleaded avgas that can replace 100LL for all aircraft in the GA fleet, with a transition that can be done effectively and efficiently, with no negative impact on safety. Several promising solutions are currently being evaluated.

WHY IS THERE LEAD IN AVIATION FUEL?

The majority of general aviation aircraft were designed to operate with fuel formulated to prevent engine detonation - a dangerous condition that can result in a sudden engine failure due to damage it can cause. For decades, a lead-based additive has been the solution to get the high octane needed to prevent detonation. Finding a suitable substitute that doesn't contain lead has been challenging, but there has been progress in recent years. Even though aviation gasoline represents only one-third of 1 percent of all gasoline sales in the United States, the aviation industry is fully behind a smart and safe transition to an unleaded future.

CAN ALL AIRCRAFT USE UNLEADED FUEL?

Unleaded fuels are currently available, but only low-compression aircraft engines can burn this fuel. However, 75 percent of the total avgas consumption is by aircraft requiring 100-octane fuel. So far, the only fully approved way to achieve 100 octane is with a lead-based additive.

AOPA and the entire general aviation industry are fully aware that there is no safe amount of lead and, while this is a very complex matter involving issues of safety, performance, practicality, economics, chemistry, and logistics, we are committed to the safe and efficient fleetwide transition to an unleaded fuel as quickly as possible.

We, therefore, ask the Senate Education, Health & Environmental Affairs Committee to recognize these initiatives and not invest in additional studies to determine what the general aviation industry already knows and is working diligently to correct.

We invite you to visit www.aopa.org/100UL or contact me with any questions by phone at (301) 695-2090 or at sean.collins@aopa.org.

Sincerely,



Sean M. Collins, AOPA
Eastern Regional Manager