

Accelerating Growth: The RFS in 2026 and Beyond

The Renewable Fuel Standard (RFS) remains one of America's most successful clean energy policies.

For nearly 20 years, the RFS has fostered a new American industry that supports hundreds of thousands of jobs in the rural economy, helps reduce carbon emissions, provides more affordable fuel options at the pump, and enhances security.

In 2023, the U.S. Environmental Protection Agency (EPA) set renewable volume obligations (RVOs) for the first time without relying on statutory volumes set by Congress. Instead, EPA was required to set the standards by considering six statutory factors that include costs, climate change, air quality, energy security, and infrastructure, among others. The “Set” rule that EPA finalized for the 2023-2025 RVOs maintained the 15 billion gallon implied conventional RVO that EPA had long established in previous years, provided a modest increase in non-cellulosic advanced and biomass-based diesel (BBD) RVOs, and did not project any SREs for the period.

EPA SHOULD

ENSURE RFS INTEGRITY BY:

- ASK** Setting implied conventional volumes at more than 15 billion gallons.
- ASK** Establishing advanced RVOs that account for the rapid growth of renewable diesel and imported biomass-based diesel feedstocks, such as used cooking oil and tallow.
- ASK** Implementing forward-looking requirements for cellulosic biofuels to spur continued innovation and growth.
- ASK** Prohibiting unwarranted or illegal small refinery exemptions (SREs); requiring EPA to estimate future SREs when setting RVOs and reallocate blending obligations accordingly.
- ASK** Establishing a three-year RVO (2026-2028) to provide bioethanol producers with longer-term certainty.

KEEP CARBON MODELING UP-TO-DATE BY:

- ASK** Updating EPA greenhouse gas lifecycle analysis (LCA) to reflect the best available science on the climate profile of biofuels like bioethanol produced from corn starch, such as the Argonne National Laboratory's GREET model.

ENCOURAGE FLEXIBILITY IN CARBON REDUCTION QUALIFICATIONS BY:

- ASK** Making corn starch alcohol-to-jet fuel eligible as an advanced biofuel, and approving an RFS pathway for corn starch alcohol-to-jet fuel.
- ASK** Recognizing carbon capture and sequestration in bioethanol production as a carbon-reducing technology under the RFS.
- ASK** Approving pending registrations by the EPA for cellulosic biofuels made from kernel fiber.

CONGRESS SHOULD

- ASK** Approve the Fuels Parity Act, which would allow bioethanol derived from corn starch to qualify as an advanced biofuel under the RFS.
- ASK** Approve the Adopt GREET Act, which would require EPA to update its lifecycle analysis model to account for all of the emissions reductions achieved by using bioethanol.

WHAT'S AT STAKE

Despite no longer having specific statutory requirements, **EPA is still required to stay true to Congress's overarching directive — to advance the growth of renewable fuels blending under the RFS to meet our nation's climate and energy goals.**

ROBUST SET =  LOWER EMISSIONS +  AMERICAN ENERGY

A robust Set means lower carbon emissions and increased production of domestic energy, and biofuels like bioethanol play a critical role. They will continue to do so because liquid fuels are projected to remain essential to the transportation sector for decades to come.

A stronger RFS will move America closer toward a net-zero future, strengthen U.S. energy security, and drive investment in rural communities.

