

Rebuild the Farm Economy with a Robust Renewable Fuel Standard (RFS)

For nearly 20 years, the RFS has been a bedrock policy that supports hundreds of thousands of American jobs, provides more affordable fuel options at the pump for American drivers, enhances American energy and national security, and reduces emissions.

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.

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 energy goals — as it sets RFS volumes for 2026 and beyond. The RFS also requires EPA to finalize RVOs 13 months before they are to take effect, meaning the “Set II” is already late, and needs to be finished quickly.

WE ASK THAT EPA DO THE FOLLOWING AS THEY DRAFT THAT PLAN:

- ASK** Ensure that more than 15 billion gallons of conventional biofuels (corn starch ethanol) are included in any RVO.
- ASK** Minimize Small Refinery Exemptions (SRE) as SREs reduce demand for farmers and lower crop prices.
- ASK** Estimate and account for expected SREs each year and reallocate those exemptions to other refineries.
- ASK** Finalize the RVO quickly as it’s already late, and have the rule last 3 years.
- ASK** Keep SAF fuels in the biomass-based diesel pool, which is where they are correctly placed today.
- ASK** Establish 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** Approve an RFS pathway for corn starch alcohol-to-jet fuel.

IN ADDITION, WE ASK THAT CONGRESS:

- ASK** Pass legislation to make corn starch ethanol eligible as an advanced biofuel (H.R. 3337, 118th Congress), as corn starch ethanol has proven it can meet the 50 percent greenhouse gas emissions reduction threshold in the law and is currently the **only** feedstock prohibited from being included in this pool.

WHAT’S AT STAKE

ROBUST SET II = ↓ LOWER EMISSIONS + ↑ AMERICAN ENERGY

A robust Set II means lower emissions and increased production of domestic energy like ethanol as liquid fuels are projected to remain an essential part of our energy mix decades to come.

