Prepared Testimony of Growth Energy CEO Emily Skor

U.S. Environmental Protection Agency (EPA) Hearing on Proposed Renewable Volume Obligations (RVOs) for 2026 and 2027 under the Renewable Fuel Standard (RFS)

July 8, 2025

Good morning. My name is Emily Skor, I am CEO of Growth Energy, the nation's largest biofuel trade association. Growth Energy represents 97 ethanol producers that, collectively, produce more than half of our country's ethanol.

The Renewable Fuel Standard continues to be one of our nation's most successful energy policies. We are grateful to President Trump and Administrator Zeldin for this RVO proposal, which embraces the RFS as an economic engine for American agriculture.

If finalized, these RVOs would unlock investments, create jobs, and support growth in rural America by expanding our country's renewable fuel production and use.

By setting conventional biofuel blending volumes at 15 billion gallons for two years, this proposal will create the kind of certainty that spurs innovation and truly unleashes American energy dominance.

This is the strongest RFS proposal we've ever seen, with the highest volumes ever, showing this administration's commitment to American biofuel producers and the farmers that depend on them.

EPA deserves recognition for starting this conversation on such robust terms, but how the agency decides to handle small refinery exemptions (SREs) will ultimately determine how much rural America benefits from this proposal.

Our industry strongly supports EPA's continuation of its previous policy to appropriately account for any SREs that might be granted in 2026 and 2027. But we remain vigilant and concerned about the nearly 200 SREs still pending from past compliance years.

We agree with our colleagues at the American Petroleum Institute that these exemptions should be granted sparingly and limited only to cases where actual disproportionate economic harm from compliance with the RFS can be demonstrated. If EPA decides differently and grants SREs without protecting against market-distorting impacts, those exemptions could devastate demand for American biofuels, ultimately erasing the benefits farmers see from what should be a game-changing RVO proposal.

Beyond this proposal, we urge EPA to pursue all the other avenues at its disposal to ensure the success of American biofuels and American agriculture. The agency should clear the backlog of pathway approvals for renewable fuel. It should work with Congress to support

permanent year-round access to E15 and finalize its proposal to simplify E15 infrastructure and labeling requirements.

But most importantly, the agency must finalize this proposal, while making it clear that SREs will not be granted recklessly, and that any gallons lost to SREs will be made up in the market. Only with these pieces in place can this proposal truly deliver the game-changing impact the president wants it to have, and that the nation's biofuel producers and rural communities are counting on.

Thank you for your consideration.