

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

For 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.

On June 13, 2025, the Environmental Protection Agency (EPA) released its proposed renewable volume obligations (RVOs) for years 2026-2027. EPA set the highest-ever blending obligations at 24.02 billion RINS (renewable identification numbers) for 2026 and 24.46 billion RINS in 2027, which represent gallons of renewable fuel to be blended into the fuel mix each year. Those figures include 15 billion implied gallons of conventional biofuels (like corn ethanol) for each year, as well as an increasing number of gallons of advanced and cellulosic biofuels.

On August 22, 2025, the EPA released their decision on the almost 200 pending small refinery exemption (SRE) requests, covering compliance years 2016-2024. EPA also announced that it would soon be releasing a proposed rule to take comment on reallocating waived SRE gallons for the 2023 and newer compliance years. While the number of granted SREs is on its face high and we still need to see the key details of EPA's forthcoming rule on reallocation, EPA's approach largely clears the backlog of pending SREs and provides positive signals moving forward as we work to finalize the RVO proposal.

Congress intended for SREs to be granted sparingly, as a temporary measure, and only when a refiner demonstrates "disproportionate economic hardship" in complying with the RFS. EPA should treat SREs as extraordinary measures that require a high standard of proof, consistent with the law. EPA should forecast any potential 2026 and 2027 exemptions as part of the final RVO to ensure we blend the full volume of required renewable fuel each year, as the Trump Administration did in 2020. A robust RVO, as currently proposed, supports rural economic growth, energy security and lowers fuel costs for all drivers.

WE ASK THAT EPA:

- ASK** Finalize the proposed RVO rulemaking as proposed, including 15 billion gallons of conventional biofuels (corn starch ethanol) for 2026 and 2027.
- ASK** Prohibit unwarranted or illegal small refinery exemptions (SREs).
- ASK** Maintain its policy principle established under President Trump's first administration to ensure that any SREs granted would not come at the expense of overall RVO requirements.
- ASK** Finalize the RVO by October 31, 2025.
- ASK** Finalize the proposal for biomass-based diesel and advanced biofuel RVOs that account for the rapid growth of renewable diesel and properly recognize homegrown feedstocks.
- ASK** Approve and complete RFS pathways including for corn oil from ethanol wet mills, ethanol produced with carbon capture, kernel fiber from grain sorghum, as well as 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 +  FARM INCOME

A robust Set II means lower emissions, increased domestic production of ethanol, and higher farm incomes.

