

Prepared Testimony of Growth Energy CEO Emily Skor

U.S. Environmental Protection Agency (EPA) Hearing on the Proposed Supplemental Notice of Proposed Rulemaking for the Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes

October 1, 2025

Good morning. My name is Emily Skor, I am the 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 remain grateful to President Trump and Administrator Zeldin for continuing to push the entire RVO proposal forward and to embrace the RFS as an economic engine for American agriculture.

Ultimately, once finalized, these RVOs will truly unleash American energy dominance by unlocking investments, creating jobs, and supporting growth in rural America through expansion of our country's renewable fuel production and use.

As the RFS celebrates two decades of success, refiners have had ample time to make investments in renewable fuels and higher ethanol blends. We continue to believe that these small refinery exemptions (SREs) should only be granted sparingly and in very limited circumstances.

In August, we saw EPA take a thoughtful and reasonable approach to the more than 200 pending SREs weighing on the RFS program. After clearing out the older SREs, those for 2022 and earlier, and not bloating the RIN bank, the agency has in this supplemental proposal appropriately focused on the pool of exempted gallons for 2023 through 2025.

We further support EPA's reasonable approach to these gallons, which seeks to fully account for them so that biofuel demand is not lost. The proposal also outlines a stable and consistent process to account for projected exemptions moving forward.

The bottom line – if the agency follows through on the proposal, and if it properly accounts for the refinery exemptions it has granted and will grant moving forward, EPA can and will protect biofuel production and demand for U.S. farm commodities, in line with the goals of the RFS. Given the looming crisis in the ag economy, the agency's approach promises to serve as an economic lifeline to American farmers.

Beyond this proposal, we continue to 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 E15 and finalize its proposal to simplify E15 infrastructure and labeling requirements.

But most importantly, the agency must move quickly to finalize the RVO proposal – our industry cannot wait any longer. Only with these pieces in place can the RFS 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.