
**RFA Testimony to EPA Virtual Public Hearing
on Proposed Renewable Fuel Standards for 2026 and 2027**

Docket EPA-HQ-OAR-2024-0505

July 8, 2025

Good morning. My name is Geoff Cooper, and I am the CEO of the Renewable Fuels Association, the leading trade association for U.S. ethanol producers. We appreciate the opportunity to comment on EPA’s proposed RVOs for 2026 and 2027.

We strongly support EPA’s RVO proposal and believe it represents an important step toward achieving President Trump’s vision for lower gas prices, a stronger agriculture industry, and American energy dominance. It provides crucial growth opportunities for U.S. ethanol producers and farmers, while boosting the supply of lower-cost, American-made energy.

RFA fully supports the proposed implied conventional renewable fuel volumes of 15 billion gallons for both 2026 and 2027. This will provide the ethanol industry with room for growth as E15 continues to gain momentum in the marketplace. We also support the Agency’s stated intention to use the latest EIA forecasts of gasoline and ethanol consumption in the final rule’s RVO calculations, as the proposal’s projections of ethanol consumption are well below the actual levels observed in recent years.

We applaud EPA for indicating that it will prospectively reallocate any renewable fuel volumes lost to small refinery exemptions in the final rule. However, we believe the Agency must be extremely judicious in determining whether any refiners truly have suffered, or will suffer, “disproportionate economic hardship” related to compliance with the RFS. And it is critically important that EPA accurately estimate exempted volumes in the final rule to ensure that the volume requirements that are actually implemented in 2026 and 2027 match those that are published in the rule.

RFA also supports the proposed cellulosic biofuel, biomass-based diesel, and total advanced biofuel volumes, and we appreciate EPA’s recognition that cellulosic ethanol from corn kernel fiber can contribute significantly to meeting the cellulosic RVOs.

Finally, the statutory purpose and fundamental intent of the RFS is to boost and diversify domestic energy production, foster American energy independence, and stimulate rural economic development in the United States. Thus, RFA strongly supports EPA’s proposed 50-percent reduction in RINs generated for import-based renewable fuels. We fully agree with EPA that there are “reduced economic, energy security, and environmental benefits” provided by imported renewable fuels. However, enhanced recordkeeping and reporting procedures—as contemplated by EPA—are not needed for corn-based ethanol, given that the U.S. does not import corn ethanol.¹ And, whole corn imports—which could conceivably be used as feedstock for ethanol

¹ <https://ethanolrfa.org/file/2909/2024%20Ethanol%20Trade%20Summary.pdf>

production—typically represent about one-tenth of 1 percent of U.S. corn supplies.² It is perfectly safe and logical to assume that corn ethanol used to meet RFS compliance obligations is produced in the United States from domestically-grown feedstock.

Thank you, and I look forward to any questions.

² <https://www.usda.gov/oce/commodity/wasde/wasde0625.pdf>