



August 7, 2025

Administrator Lee Zeldin
Environmental Protection Agency
1201 Constitution Avenue N.W.
Washington, DC 20004

Dear Administrator Zeldin,

Illinois Farm Bureau (IFB) appreciates the opportunity to offer comments on the proposed Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of Cellulosic Biofuel Volume Requirement, and Other Changes.

Founded in 1916, IFB is a non-profit, membership organization directed by farmers who join through their county Farm Bureau. IFB has a voting membership of more than 70,000 and represents three out of four farmers in the state. IFB is also a member of the American Farm Bureau Federation® (AFBF®), a national organization of farmers and ranchers.

Biofuels play a crucial role in supporting American agriculture by fostering a strong and consistent demand for domestically grown feedstocks. Renewable fuels also support rural economies by driving investment in infrastructure and creating jobs. Since its inception, the RFS has played a critical role in expanding commodity markets and economic growth. Furthermore, clean fuels provide a lower cost at the fuel pump while promoting consumer choice.

IFB's members drive all policy positions for our organization through our grassroots policy process. Consequently, IFB policy places a high priority on the growth of renewable fuel markets and generally supports expanding the utilization of renewable fuels and the RFS.

With significant growth anticipated in soybean crush and biofuel production capacity, the 2026 and 2027 Renewable Volume Obligation (RVO) levels will play a critical role in sustaining momentum and ensuring continued expansion of domestic renewable fuel markets. The following are IFB's response to the proposed volumes and additional request for information.

Renewable Fuel Volumes and Analysis in response to A-1, A-7, A-8

IFB supports the proposed 2026 and 2027 RVO levels across cellulosic biofuel, biomass-based diesel (BBD), advanced biofuel and total renewable fuel categories. The significant increases in the volume requirements offer market certainty for farmers and strengthen long-term demand for corn and soybeans. Biofuel regulated under the RFS contributes to a vital and ever-expanding market for our members, supporting both commodity prices and rural economic development. Specifically, the increased volume requirements for BBD will help address ongoing challenges in the soy biodiesel industry. Recently, a lack of clear regulatory direction has hindered biodiesel



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production, forcing some biodiesel plants to operate below capacity or completely idle. As noted in the analysis for the rule, the United States is projected to see significant expansion in domestic crushing capacity over the next two years. This underscores the urgency of aligning RVO levels with actual and anticipated production, ensuring the BBD market remains competitive.

Moreover, because of the anticipated growth in crush capacity and overall renewable fuel production, IFB believes RVO levels should be announced on a two-year rotation. A biennial schedule provides greater predictability and enables U.S. EPA to make informed decisions based on current and future production capacity. Extending the timeline between announcements creates an unnecessary risk that fails to account for new biofuel plants that come online after a specific rule is set, limiting the program's responsiveness to market developments.

Import RIN Reduction in response to B-1, B-2

IFB policy supports renewable fuel policy that prioritizes the use of domestically grown commodities. Accordingly, IFB strongly agrees with the proposal to reduce the value of Renewable Identification Numbers (RINs) for biofuels that are imported or use imported feedstock. This policy adjustment will strengthen and expand biofuel markets that many of our members rely on.

The growing reliance on imported feedstocks, specifically used cooking oil and tallow, has had a significant impact on the non-cellulosic advanced biofuel sector. According to rulemaking analysis, almost 50% of non-cellulosic advanced biofuel was either imported or produced from imported feedstock in 2024. This shift away from U.S. grown vegetable oils has impacted smaller biodiesel facilities, as well as domestic commodity markets.

Furthermore, defining the term 'point of origin' is a necessary step in improving the traceability and verification of feedstocks used for biofuel production. While IFB generally agrees with the proposed definition, IFB asks U.S. EPA to clarify that imported feedstocks still generate half of a RIN, even when delivered to a domestic supplier like a domestic grain elevator. The clarification would reinforce the domestic feedstock provision and protect American farmers.

The modification to RIN values for imported clean fuels and imported feedstock used to produce them marks an important step toward restoring market balance, supporting Illinois farmers, and garnering U.S. energy independence.

Removal of Renewable Electricity from the RFS Program in response to C-2

The RFS was implemented to boost renewable fuel markets and use in the United States. While no fuel pathways have yet been approved for electric RINs, or eRINs, the potential inclusion of such pathways risks diverting the program from its original intent. IFB supports the exclusion of eRINs from the RFS. Allowing eRINs could undermine the core mission of the RFS by shifting focus away from liquid biofuels. U.S. EPA should preserve the integrity of the program by remaining centered on renewable fuels.

Policy Considerations in response to E-2, E-4

Sustainable aviation fuel (SAF) presents a significant new market for farmers, offering another avenue to supply homegrown feedstocks for renewable fuels. The development of an alcohol-to-jet (ATJ) fuel pathway signals meaningful progress toward making the SAF marketplace viable.

Similarly, carbon capture and storage (CCS) has gained momentum, especially as policy increasingly emphasizes the carbon intensity of clean fuels. Given the growing relevance of CCS, it is crucial that U.S. EPA is proactive and is ready to provide effective oversight as CCS becomes more widely adopted.

As noted above, the purpose of the RFS is to promote growth of renewable fuels in the United States. As the global biofuel industry continues to expand, it is more important than ever to protect the use of homegrown commodities. In 2024, U.S. EPA began conducting audits to validate imported feedstock for renewable fuels. IFB urges the continuation and expansion of these audits under the new RFS rule. Additionally, we encourage U.S. EPA to develop robust testing standards to safeguard the integrity of the program to verify the validity of imported feedstocks where they are used. These standards must be carefully designed, as they are likely to serve as a foundation for other clean fuel programs administered at both state and federal levels.

Other considerations

The treatment of the pending Small Refinery Exemptions (SREs) will play a crucial role in the overall effectiveness of the 2026 and 2027 RFS. IFB appreciates the proposed RVOs account for projected SREs likely to be granted. This strategy helps minimize disruption in the RIN and commodity markets, while supporting the soundness of the RFS.

However, that does not underscore the concerning trend in which SREs are increasingly used to avoid compliance, rather than to address a unique circumstance. As pending SRE applications are reviewed, IFB urges U.S. EPA to take a careful, evidence-based approach to granting exemptions so the original intent of the RFS is protected.

Conclusion

IFB supports the proposed RVO levels for 2026 and 2027, as well as other policy considerations. By promoting the use of domestic feedstocks, maintaining the integrity of the RFS, and aligning levels with actual production capacity, the program will continue to provide support to farmers and rural economies. IFB urges U.S. EPA to uphold a fair and transparent SRE process. IFB also asks that the RFS is updated to reflect current and future biofuel growth opportunities, by releasing RVO levels on a biennial basis, and expanding pathways for SAF and CCS.

Illinois Farm Bureau appreciates the opportunity to submit these comments. If you should have any questions, please do not hesitate to contact Noelle Neef, Assistant Director of Energy, at nneef@ilfb.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Duncan".

Brian Duncan, President
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