

Labor & Energy Alliance Action Alert

URGE EPA to Modify its June 2025 Renewable Volume Obligations (RVOs)'s Proposed Rule

Please urge EPA Administrator Zeldin to modify its June 2025 Renewable Volume Obligations (RVOs)'s Proposed Rule established under the Renewable Fuel Standard (RFS) for 2026 and 2027. When finalizing this rule, we urge the Administrator to consider the impact the refining sector has on the American economy, ensure the rulemaking maintains stability in the domestic fuels market, and sustain a strong and competitive industry that is vital to our nation's energy security.

In particular, we recommend minimizing RVO increases to avoid a large and expansive regulatory mandate on the industry. Overall, the liquid fuel manufacturing industry has made significant investments and spent billions of dollars to comply with the Renewable Fuel Standard (RFS) since its inception in 2005. A significant increase in RVO obligations would place an unsustainable burden on refineries and significantly increase costs on U.S. consumers and businesses.

Additionally, we urge that Small Refinery Exemptions (SREs) do not reallocate regulatory burdens on larger refiners. SREs are essential to helping small refineries manage the regulatory costs of the RFS program, but it is critical these obligations are not transferred to other refineries. Reallocating these obligations would place an undue burden on companies that have invested billions of dollars to legally comply with the program and create significant disruptions in the fuel market. Please consider offering these comments to the supplement proposed rule that addresses the reallocation of waived Renewable Volume Obligations (RVOs) from small refinery exemptions (SREs). The comment period is open until **October 31, 2025**. The comments must be submitted to Docket ID No. [EPA-HQ-OAR-2024-0505](https://www.epa.gov/dockets/epa-hq-oar-2024-0505)

Finally, we recommend the EPA maintain a 100% Renewable Identification Number (RIN) value for imported renewable fuels and feedstocks. Domestic producers rely on global supply chains for cost-effective feedstocks and imports are critical to the viability of the domestic refinery industry. If the RIN value for foreign feedstocks is reduced, domestic fuel manufacturers will be at a competitive disadvantage compared to foreign producers, hampering President Trump's strategy to unleash American energy.

As such, we urge EPA's final RVO rule to:

- Minimize RVO volumes to be in alignment with market realities and to reflect standards that can be met with domestic feedstocks;
- Prevent the reallocation of RIN obligations for any granted SREs; and
- Maintain a 100% Renewable Identification Number (RIN) value for imported renewable fuels and feedstocks.

Please call upon me anytime if you have any questions, and I look forward to your response.