In a series of comments submitted recently to EPA, leading labor groups made the case to President Biden and EPA Administrator Michael Regan for reductions to the proposed 2022 Renewable Fuel Standard (RFS) volume mandate. An unachievable and costly RFS is a threat to good union jobs. Below are excerpts from these groups:

Delaware Building & Construction Trades; Philadelphia Building & Construction Trades Council; United Camden & Vicinity Building & Construction Trades Council

> "We stand on the brink of losing tens of thousands of family-sustaining union jobs, along with the last few remaining refineries on the East Coast – refineries which provide our nation with vital transportation fuels home heating fuel, and other products critical to the American economy… Collectively, our three unions represent 125,000 skilled craft professionals that constitute the Philadelphia, Delaware and Southern New Jersey Building Trades Unions. Our members depend on our regional refineries because they provide one of the highest-paying and most consistent sources of employment for thousands of members, accounting for millions of man-hours every year."

United Steelworkers (USW)

> "Our union is the largest industrial union in North America and the largest union in refining… Our union has been an active stakeholder on the Renewable Fuel Standards (RFS) Program over the years… the unintended consequences of this proposal for 2022 could have devastating consequences for USW members who work at refineries… This program needs reform that relies on available data, considers environmental impact, eliminates unpredictability in the RINs market, and ensures that working people's livelihoods aren't the unintended victims."

United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada, AFL-CIO

> "The UA, which represents over 359,000 skilled craftspeople in the plumbing and pipe fitting trades, is the leading international labor union in the energy sectors…. The United Association is submitting these comments because of an urgent concern that the EPA's proposed RVOs for 2022 … will have devastating consequences for tens of thousands of union refinery workers and their families, from the UA as well as other building trades, who rely on these facilities to support a good, middle-class lifestyle… If those refiners choose to slow or halt production as a means of reducing their cost of RFS compliance, the consequences will be disastrous for the hardworking union members employed at those refineries, their families, and the surrounding communities."

North America's Building Trades Union (NABTU)

> "The refining industry works closely with our affiliated unions' members across the country and provides the unionized construction industry with thousands of high-paying, middle class

sustaining job opportunities… the proposed RVO target for 2022 would have clear and direct negative impacts on the industry and on the livelihood of our members."

Affiliated Construction Trades Ohio Foundation (ACT Ohio)

"…the proposed EPA rule threatens Ohio Building Tradespeople's jobs in Ohio's refining sector at a time when these jobs are already in jeopardy… more realistic 2022 RVO levels will help protect union construction jobs in Ohio and avoid undue increases in consumer fuel prices at a time of continued uncertainty in our state's vital oil, gas, and petrochemical industries."

United Brotherhood of Carpenters and Joiners of America

"On behalf of the more than half a million skilled professionals that the United Brotherhood of Carpenters and Joiners of America (UBC) represents… the proposed rule threatens our members' family-sustaining jobs throughout the refining sector. Many independent refiners employing UBC members now pay more for RINs than all other operating costs, including payroll."

International Union of Operating Engineers (IUOE)

"Thousands of Stationary Engineers are directly employed in the petrochemical and refinery business… To save jobs and stabilize gas prices, the International Union of Operating Engineers respectfully requests that the EPA reduce the Renewable Volume Obligation for conventional biofuels in 2022 by one billion gallons in its final rule."

International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths, Forgers & Helpers

"Members of the IBB are responsible for constructing, maintaining, and repairing the industrial equipment and infrastructure at independent refineries that would be directly affected by EPA's proposed rule and proposed SRE decisions… The protection of these refinery jobs is critically important because they provide one of the highest-paying and consistent sources of employment for thousands of skilled workers, potentially accounting for millions of man-hours every year."

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