WASHINGTON, Jan. 10, 2023—Today, AFPM Senior Director of Fuels and Vehicle Policy, Patrick Kelly, testified during the Environmental Protection Agency's (EPA's) public hearing on the proposed Renewable Fuel Standard (RFS) "Set" Rule covering years 2023-2025. Patrick's prepared comments are summarized below and linked in their entirety here.

- AFPM supports reducing the carbon impact of transportation fuels, and the refining sector has made significant investments to reduce carbon emissions.
- Congress directed EPA to focus the RFS on second generation, lower carbon biofuels after 2022. EPA's proposal will stifle advanced biofuels, promote first generation biofuels beyond the market's ability to absorb them and shift overall RFS growth away from liquid biofuels and into the power electricity sector. **This is completely contrary to how congress envisioned EPA's handling of the program.**
- EPA should revise its proposal to reflect the following:

1. **The RFS implied conventional biofuel mandate should be based on a realistic projection of market consumption & below 15 billion gallons.** Continually relying on advanced biofuels to meet a portion of the implied mandate inflates the cost of every D6 RIN, imposing unnecessary costs without corresponding carbon emission reductions.
2. **The total advanced biofuel volume should be based on a reasonable projection of annual consumption, which EPA has undercounted.** Refiners have made large investments in renewable diesel and EPA's proposal unhelpfully caps our ability to utilize the fuel to satisfy RFS obligations and reduce overall carbon emissions from the transportation sector.
3. **The focus of RFS should remain on liquid biofuels.** eRINs will discourage investment in the biofuel sector & inappropriately charge refiners and American drivers with the cost of reducing power sector emissions. Making automakers RIN generators is a clear attempt to siphon capital away from liquid biofuels to electric vehicles.

Patrick Kelly's full remarks, as prepared, are available here.

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About AFPM:

The American Fuel & Petrochemical Manufacturers (AFPM) is the leading trade association representing the makers of the fuels that keep us moving, the petrochemicals that are the essential building blocks for modern life, and the midstream companies that get our feedstocks and products where they need to go. We make the products that make life better, safer and more sustainable — we make progress.

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Renewable Volume Obligations (RVO)

Renewable Fuel Standard (RFS)

Ethanol

Small Refinery Exemption (SRE)

Environmental Protection Agency (EPA)

Renewable Identification Number (RIN)

Refining