WASHINGTON, D.C. — The American Fuel & Petrochemical Manufacturers (AFPM) recently submitted comments on the Environmental Protection Agency's (EPA's) proposed Renewable Fuel Standard (RFS) volumes for 2026 and 2027. AFPM highlighted the following in its comments:

> *"The American Fuel & Petrochemical Manufacturers (AFPM) supports policies that enhance energy security and allow our members to provide the affordable and reliable fuels the American people deserve and expect, goals President Trump shares. Unfortunately, EPA's proposal for the 2026-2027 RFS misses the mark by an Iowa mile—doubling compliance costs from any prior year. AFPM's recommendations would reduce the cost of this regulation by up to 68%, or nearly $47 billion each year.*
>
> *"EPA proposed the costliest RFS mandates since the program began. The proposed mandates are anticipated to impose nearly $70 billion in annual compliance costs, nearly double the cost of any previous year. These costs will be borne by refiners, consumers, and the rest of the economy through the increased costs of producing and transporting goods and individual mobility, while inhibiting investment in domestic refining capacity and midstream infrastructure.*
>
> *"EPA's proposal leans on old projections of fuel and feedstock availability, instead of 2025 data. Domestically produced feedstocks and renewable fuels are simply insufficient to meet the sheer magnitude of EPA's proposed volumes, and, in fact, the proposal would require even more imports."*

Taken together, the following AFPM recommendations would reduce the compliance cost of the RFS proposal nearly 70%, while still supporting American agriculture and renewable fuel producers:

1. **Set the implied conventional mandate at the expected ethanol consumption level.**
2. **Set advanced biofuel mandates based on North American feedstock supplies.**
3. **Withdraw the proposed 50 percent import RIN reduction.**
4. **Finalize adjustments to the 2025 cellulosic biofuel standard.**
5. **Act promptly on outstanding small refinery exemption petitions without reallocating exempted volumes.**
6. **Finalize the rescission of the electric vehicle RIN (eRIN) pathway.**

Background resources:

- AFPM comments on the 2026-2027 RFS RVOs
- Turner Mason & Company analysis of RFS cost scenarios
- S&P Global Commodity Insights analysis of global biofuel and feedstock availability to meet biodistillate RVOs

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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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