October 31st, 2025

The Honorable Lee Zeldin, Administrator
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Docket No. EPA-HQ-OAR-2024-0505

On behalf of more than 40,000 dues-paying corn farmers and over 500,000 growers contributing to corn checkoff programs nationwide, the National Corn Growers Association (NCGA) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) proposed Renewable Fuel Standard (RFS) volumes for 2026 and 2027.

NCGA commends the Agency for proposing to maintain the implied conventional renewable fuel requirement at 15 billion gallons for both 2026 and 2027. These volume levels send a strong signal to corn growers that EPA recognizes the maturity of the ethanol industry and its vital contributions to American energy security and the rural economy. They also represent achievable, market-supported targets.

A dependable RFS is critical to unlocking America's domestic energy potential. For nearly two decades, ethanol has expanded the nation's fuel supply, reduced reliance on foreign energy, and supported American jobs across multiple sectors. The 15-billion-gallon standard provides the stability markets need to function efficiently. Corn farmers make long-term decisions about planting, technology adoption, and investment based on regulatory certainty. A strong RFS sustains the market as farmers make those decisions, providing market opportunities that support corn prices, rural economies, and family farms nationwide.

When enacted in 2005, the RFS granted EPA authority to issue Small Refinery Exemptions (SREs) to refiners that could demonstrate "disproportionate economic harm" from compliance. NCGA acknowledges the statutory role of the SRE program and appreciates EPA's efforts to bring greater transparency and consistency to how exemptions are reviewed and applied.

EPA's recent actions highlight the complexity of balancing refinery needs with RFS integrity. NCGA supports EPA's approach to reevaluate and, where appropriate, reallocate waived gallons through a supplemental rulemaking. We support a 100% reallocation and encourage EPA to adopt a transparent approach that does not erode ethanol demand, but supports opportunities for domestic ethanol growth and expanded use of corn in ethanol.

The proposed September 15 supplemental rule, which would adjust the 2026 and 2027 Renewable Volume Obligations (RVOs) to reflect waived volumes from 2023–2025, is a prudent step forward. The use of a three-year rolling average to anticipate future exemptions provides predictability and ensures that renewable fuel volumes remain robust.

Finally, timely rulemaking is essential for predictability in rural communities. Corn growers are currently facing their third straight year of negative profits. This is the largest three-year decline in net cash receipts in history, due to declining profitability with lower prices and high input costs. This year, corn farmers are facing a loss of $0.91 per bushel, a $15.29 billion loss on the national crop. It is imperative that EPA accounts for these circumstances when considering this rulemaking. The RFS was designed to promote renewable fuel growth, and by law, volumes must be finalized with sufficient lead time. EPA's on-schedule proposal for 2026 and 2027 provides welcome clarity for a sector that urgently needs it.

NCGA urges the Agency to finalize the implied conventional renewable fuel requirement at 15 billion gallons for both 2026 and 2027, as proposed, and to manage SREs in a way that upholds market integrity and promotes growth for this essential market. A strong, transparent, and balanced RFS remains a cornerstone of America's agricultural and energy success.

Thank you for your leadership and for the opportunity to provide these comments.

Sincerely,

Neil Caskey

CEO

National Corn Growers Association