The 2026-2027 Renewable Fuel Standard (RFS) proposal from the Environmental Protection Agency can only be met if the United States significantly INCREASES imports of foreign biofuels and feedstocks. In short, the RFS proposal is at odds with the President's 'energy dominance' agenda.

There are three big issues with EPA's advanced biofuel proposal:

1. **The advanced biofuel mandate is too big.** EPA overshot how much domestic advanced biofuel and advanced biofuel feedstock will be available in 2026 and 2027.

   Here's the backstory. EPA used old data from 2023 and 2024 — none of the available 2025 data — to arrive at the 2026-2027 RFS proposal. EPA basically just assumed the same growth trends in domestic biofuel feedstock and production from those earlier years would continue into 2026 and 2027. But things have changed, and data from ***this year*** show advanced biofuel production in the United States is declining.

2. **The advanced biofuel mandate will require a significant uptick in imports.** This ties back to the previous point. If advanced biofuel feedstock and production had kept pace with 2023 and 2024 growth trends, it *MIGHT* have been possible — in theory — to satisfy the full RFS advanced biofuel mandate with JUST American fuel and feedstocks.

   But, as we stated above, EPA's supply assumptions are wrong. So, the only way to meet the too-big mandate is by INCREASING the amount of advanced biofuel feedstock imported into the United States.

3. **EPA wants to penalize advanced biofuel imports while simultaneously requiring more of them… make it make sense!**

   For 2026 and 2027, EPA wants to cut the RFS value of any imported biofuels and feedstocks in half, supposedly to boost demand for domestic fuels and feedstocks. But remember, the proposal itself is so big, it's going to require ***more feedstock imports.***

Fixing the advanced biofuel portion of the RFS doesn't have to be complicated. In fact, AFPM has given EPA a head start. EPA leaned on an S&P Global Commodity Insights analysis of 2023-2024 data to inform its proposal. AFPM commissioned the same team at S&P Global Commodity Insights to run the same analysis, just of the latest 2025 data. And if EPA simply swaps in the new analysis for its final 2026-2027 RFS, they'd trim down the advanced biofuel portion of the mandate to reflect actual domestic advanced biofuel and feedstock supplies.

EPA should also scrap the plan to de-value imported fuels and feedstocks, especially when the mandate can't be satisfied without them. There are other issues as well:

- **Not every advanced biofuel production facility or refinery in the United States has equal**

or economic access to domestic soybean oil. In fact, it would add significant time and cost if coastal facilities far from the U.S. Heartland were made to run solely on domestic feedstocks.

- **Refineries and biofuel manufacturing facilities often have long-term feedstock contracts, some of which already extend into the 2026 RFS compliance year.** Feedstock origin has never been part of the RFS credit value calculus, and EPA cannot suddenly insert that into the program, particularly since major business decisions have been made in the years since the RFS was enacted based on an understanding of how the federal government viewed and valued biofuel feedstocks.
- **There are mile-wide loopholes in the import penalty plan.** EPA's proposal would punish U.S. fuel manufacturers who import 'crushed' feedstocks into the United States to make biofuels here. It would, likewise, punish imports even if they were made from U.S. soy, but crushed elsewhere, before being imported back into the United States. However, foreign soy that gets imported and crushed here, would get full credit under EPA's RFS proposal. That's illogical.

Just on the news of EPA's proposal, RFS credit prices and soybean oil commodity prices jumped because the market recognizes there's a scarcity of domestic feedstocks and fuel to fully satisfy EPA's proposal. For an administration that prioritizes American energy dominance and affordability, this RFS proposal is way out of line.

Additional background:

- 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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