



TENNESSEE FARM BUREAU FEDERATION

April 10, 2025

United States Internal Revenue Service
Room 5203
P.O. Box 7604
Ben Franklin Station
Washington, DC 20044

Re: Docket Nos. IRS-2025-0002-0001 (Notice 2025-10); Section 45Z Clean Fuel Production Credit; Request for Comments

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to comment on the United States Internal Revenue Service's (IRS) request for comment pertaining to the Section 45Z Clean Fuel Production Credit (45z tax credit). TFBF is a general farm organization of over 695,000 members whose purpose is to represent the widely varied commodity producers of Tennessee. Our policy is developed through a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies on numerous issues related to agriculture and rural living. On behalf of our farmer members, we encourage the IRS to consider these comments.

Farmers have a deep and long-standing interest and role in protecting the environment based on philosophical beliefs and practical self-interest. Balancing earning a living from the land while being stewards of the land, air, and water is top of mind for farmers across the country. Increasingly, farmers are asked to produce more using fewer resources while simultaneously decreasing their environmental footprint. From climate-smart farming practices to voluntary management of forests, grasslands, wetlands, and croplands, farmers are actively reducing their carbon footprint and absorbing carbon from the atmosphere.

The intent of the 45z tax credit is to incentivize production of biofuels with low greenhouse gas (GHG) emissions impacts. While TFBF supports this initiative to encourage biofuel production, it is of utmost importance for the IRS to ensure the commodities American farmers grow are not only eligible for consideration as feedstocks for biofuels but are also the preferred feedstock for domestic biofuel production. The failure of the current 45z tax credit to prioritize domestic feedstocks for biofuel production has resulted in exponential increases in imports of used cooking oil and other oils from other countries. We urge the IRS to place exclusive priority on domestic feedstocks by restricting foreign feedstock producers from participating. Doing

this will ensure American farmers and feedstock producers are the primary source for biofuel production and bolster the agricultural economy by providing new market opportunities.

Biofuels can be a significant market for U.S. commodities, and we support tax credits to incentivize biofuel production. We support the continuation of the 45z tax credit but urge IRS to unlock the ability of the American farmer to be the primary supplier of feedstocks for biofuels. Farmers in Tennessee and across the nation have a proven record of utilizing carbon reduction production practices when the environmental benefits and increased profit motive are recognized. Tennessee farmers are ready to take the lead in providing feedstocks for domestic biofuels. We encourage IRS to act swiftly to make improvements to the 45z tax credit and prioritize our farmers in the United States.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry". The signature is written in black ink and is positioned below the word "Sincerely,".

Eric Mayberry
President
Tennessee Farm Bureau Federation