



TENNESSEE FARM BUREAU FEDERATION

August 7, 2025

Dallas Burkholder
Assessment and Standards Division
Office of Transportation and Air Quality
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105

Re: Docket No: EPA-HQ-OAR-2024-0505; Renewable Fuel Standard Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement and Other Changes

The Tennessee Farm Bureau Federation (TFBF) represents a diverse group of farmers across the state and, with over 690,000 members, is the largest general farm organization in Tennessee. Our policy is developed through a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies on various issues, including renewable fuel opportunities for crop producers. On behalf of our member farmers, we appreciate the opportunity to provide comments to the Environmental Protection Agency (EPA) on the proposed renewable fuel standard program standards for 2026 and 2027.

Tennessee farmers continue to be strong leaders in producing feedstocks for clean, abundant, and renewable energy sources for our state and the nation. The same ambition that advanced the United States as the leader in food and fiber production can place our nation at the forefront of renewable energy production and use. Especially in the current state of our struggling agricultural economy, expanding new markets for agricultural commodities, like renewable fuels, is crucial for farmers to mitigate risk and sustain their operations through economic hardships.

TFBF supports EPA's proposed increases to the four Renewable Volume Obligation (RVO) categories – total renewable fuel, advanced biofuel, cellulosic biofuel, and biomass-based diesel – for 2026 and 2027. These increased RVOs accurately reflect continued growth in multiple types of renewable fuel production. These increases drive demand for the feedstocks – corn, soybeans, and others – grown by American farmers needed to produce these renewable fuels at appropriate scale. We also applaud EPA for the proposed adjusted Renewable Identification Number (RIN) value based on whether the biofuel or

feedstock is sourced domestically. Valuing foreign biofuels and/or feedstocks at only 50% compared to domestic ones further prioritizes American production and reduces reliance on imports from other companies. With ethanol accounting for 43% of total U.S. corn use and soybean oil for biofuel production accounting for around 45% of total U.S. soybean oil usage¹, incentivizing domestic production will continue to bolster American markets. These changes will further boost U.S. net energy production and decrease our country's dependency on foreign energy markets. Furthermore, we support these efforts which will position American farmers to further supply the energy needs of Americans.

EPA's recognition of the growth and capacity of the domestic biofuels industry positively impacts American feedstock producers. In a time when the U.S. agricultural economy is experiencing significant hardships, opportunities to drive demand and expand market opportunities for American farmers are crucial to the success of the agricultural industry. TFBF appreciates EPA's acknowledgment of these markets and priority on American agriculture and supports the proposed Renewable Fuel Standards for 2026 and 2027.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry".

Eric Mayberry

President

Tennessee Farm Bureau Federation

¹ ["EPA's Renewable Fuel Proposal Boosts Volume."](#) American Farm Bureau Federation; 7/3/2025; [EPA's Renewable Fuel Proposal Boosts Volumes | Market Intel | American Farm Bureau Federation](#)