



October 31, 2025

Attention: Docket ID No. EPA-HQ-OAR-2024-0505

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

Re: Comments on Supplemental Notice of Proposed Rulemaking for Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes (Published September 18, 2025)

Dear Administrator Zeldin:

On behalf of the National Oilseed Processors Association (NOPA), we submit these comments to underscore the urgent need for EPA to finalize the Set 2 Rule as quickly as possible. Given the acute stress facing rural America, timely action by EPA is critical to restore market confidence and deliver the demand certainty that the agricultural and renewable fuels value chain urgently needs. The RFS remains one of the most effective tools for supporting rural economies, but its benefits depend on both strong volume requirements and regulatory certainty.

NOPA urges EPA to:

- Finalize the rule expeditiously to provide immediate and clear market signals.
- Fully reallocate SRE volumes for 2023–2025.
- Maintain the prospective SRE estimation methodology for 2026 and beyond.
- Maintain proposed volumes of Biomass-Based Diesel (BBD) for 2026 and 2027.
- Finalize the proposed import RIN reduction for imported fuel and feedstocks.
- Include a volume restoration mechanism if the SRE reallocation or import RIN reduction provisions are invalidated to maintain support for domestic fuels and feedstocks.

Taken together, these actions will have a substantial and positive impact across the agricultural and renewable fuels value chain. NOPA urges EPA to act swiftly and decisively to ensure the RFS delivers its full benefits to America's farmers, processors, and rural communities.

Sincerely,

Devin Mogler

Devin Mogler
President and CEO
National Oilseed Processors Association