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

U.S. Environmental Protection Agency
EPA Docket Center
Air Docket, Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Comments in Response to Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes

Dear Secretary Zeldin,

The General Aviation Manufacturers Association (GAMA), National Air Transportation Association (NATA), National Business Aviation Association (NBAA), and Vertical Aviation International (VAI), representing business aviation aircraft manufacturers, aircraft operators, and aeronautical service providers, write in support of comments submitted by the SAF Coalition related to the Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes.

The business aviation sector is an incubator for American innovation, securing U.S. global aviation leadership while propelling industry commitment to improved efficiency. The business aviation industry has continually invested in the development of innovative products, procedures, and policies, including development and proliferation of sustainable aviation fuel (SAF).

SAF is an American innovation benefiting U.S. farmers, fuel producers, and communities across the nation. American innovators in our private sector have developed novel ways to convert crops, plants, biomass, captured gases, waste, and even recycled cooking oil into jet fuel. Combining conventional jet fuel with SAF allows America's aviation industry to meet growing demand, enhance domestic energy security, and create market opportunities for American industries.

SAF represents a significant market opportunity for American agriculture, bioenergy, and technology developers by creating well-paying jobs, supporting industrial redevelopment, and providing new economic opportunities for farmers and communities in rural America. As the number of U.S. farms, ranches, and corresponding income declines, domestic SAF production with American-grown crops creates new markets for our farmers at a time when they are most needed.

The Trump Administration has an opportunity to unleash the power of American energy, agriculture, and innovation with policies that expand the production, distribution, and consumption of SAF in the United States. Our organizations, together with the SAF Coalition, encourage the Environmental Protection Agency (EPA) and the Administration to take this opportunity to fix broken policies of the past and enact

policies that will expand the production, distribution, and consumption of renewable jet fuel in the U.S. by:

- *Stimulating private sector investment*. Creating aggressive priorities for renewable jet fuel through the RFS will increase certainty and support for dramatically increasing the production of American-made renewable jet fuel.

- *Embracing feedstocks consistent with Section 45Z Clean Fuel Production Credit, as recently enacted in the One Big Beautiful Bill Act*. American energy producers have developed and utilized technological innovation to produce jet fuel from crops, waste, biomass, captured gases, used cooking oil, and more. American policy should continue to ensure American energy dominance and economic competitiveness in this market through an 'all of the above' approach to feedstocks and incentivize all of their use towards producing renewable jet fuel.

- *Cutting red tape*. From permitting to providing regulatory guidance, the federal government must remove bureaucratic barriers to incentivize investment and expedited domestic production of SAF.

We encourage EPA and the Administration to—at virtually no cost to obligated parties, commercial airlines, or business aviation—to take advantage of this opportunity to bolster a growing energy sector that will benefit American industry, farmers, and fuel producers.

In coordination with the SAF Coalition, we support the referenced comments. Specifically, we point to the following:

1. We note that new renewable jet fuel facilities are planned to come online in future years and encourage EPA to ensure that the annual volumes account for and encourage new renewable jet fuel production.

2. We commend the EPA for proposing to correct the structural disadvantage faced by renewable jet fuel relative to renewable diesel with the assignment of an equivalence value of 1.6 to both fuels. Additionally, given the relatively nascent and growing state of the renewable jet fuel market, the United States would best position itself for American energy dominance and economic competitiveness *by providing a preferential equivalence value for renewable jet fuel* to better establish this market.

3. We recommend an update to the definition of renewable jet fuel as a technical correction to the proposed definition and aligns with the comments submitted on this matter by the SAF Coalition, ABFA, A4A and others.

> "jet fuel that is renewable fuel and meets ASTM D7566 (Standard Specification for Aviation Turbine Fuel Containing Synthesized Hydrocarbons) and/or ASTM D1655 (Standard Specification for Aviation Turbine Fuels) standards"[1]

[1] Adapted from page 31 of SAF Grand Challenge Roadmap: Flight Plan for Sustainable Aviation Fuel Report.

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4. We support the creation of a general pathway for renewable jet fuel from corn ethanol in order to provide investor certainty, encourage production, and position the United States to support growing demand for SAF without relying on imports.

5. We support a broad interpretation of the definition of "produced from renewable biomass" and encourage EPA to include biogenic gases, other gases of non-biological origin and feedstocks and bio-intermediates produced from biomass and waste streams.

For emphasis and clarification, we expand on point #2 where we encourage creating a preferential equivalence value for renewable jet fuel. Our teams at GAMA, NATA, NBAA, and VAI have worked with members of the SAF Coalition on a workable solution for EPA to create a preferential equivalence value for renewable jet fuel. The same information is included as part of the SAF Coalition comments, which we reference and support as follows:

> As a specific example of how this could be implemented, the SAF Coalition suggests EPA (1) increase the equivalence value for renewable jet fuel and renewable naphtha to 1.8 RINs per gallon and (2) create a new opportunity for producers of renewable jet fuel to separate RINs upon certifying the batch of neat renewable fuel.
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> One of the main issues for the private sector when producing renewable jet fuel is balancing near-term investment with the longer-term market opportunities. In its proposal, EPA discusses the economic impact between renewable diesel and renewable jet fuel as being an even trade or economic decision to produce one rather than the other. That is not the case.
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> A few points to consider—
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> - While the cash cost of production for ATJ renewable jet fuel is on par with the cash cost of production for traditional jet fuel (excluding the cost of investment), it is important to note that more generally the initial capital investment for renewable jet fuel technology is different than that of renewable diesel. Therefore, to optimize the production facility to produce renewable jet fuel, the commitment and investment to produce greater volumes of renewable jet fuel offtake is more formidable.
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> - Optimizing a renewable jet fuel production facility beyond 30 percent renewable jet fuel into the 50 to 80 percent production threshold is the range facilities need to be in order create the efficiencies and the long-term volumes necessary to offset the initial investment.
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> - For ATJ facilities, the long-term investment profile is more challenging. Nearly all ATJ production would come from the construction of new facilities or converting and expanding existing ethanol production facilities.
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> In its proposal, EPA uses the RIN value to achieve a policy objective of incentivizing domestic feedstocks – in that the RIN value is reduced to 50 percent value, to make the RIN created from domestic feedstocks more attractive to obligated parties. We urge the EPA to provide the same policy objective for domestic renewable jet fuel production – in that the RIN value for renewable jet fuel should be increased to 1.8. Increasing the RIN value to 1.8 would, for

a handful of renewable jet fuel producers, create an economic profile that is far more even than the one proposed.

Secondly, the SAF Coalition recommends allowing producers of renewable jet fuel RINs to separate up to 2.5 RINs per gallon for each gallon of renewable jet fuel sold. EPA's current regulations effectively allow RIN separation from renewable jet under the same two circumstances common to other renewable fuel producers: at time of purchase by an obligated party, or upon blending with conventional jet fuel.[2] We propose creating a new RIN separation opportunity for renewable jet producers that would allow them to separate RINs at the time of batch certification and up to the first sale of renewable jet. This would address circumstances unique to renewable jet, in that the primary consumers of the fuel (airlines) are neither obligated parties nor necessarily desiring to obtain RINs after blending. Renewable jet producers are and will likely continue to be constrained in their ability to blend renewable and conventional jet at their facility, due to the capital costs of installing blending equipment and/or the limited availability of conventional jet fuel supply. Creating an opportunity for renewable jet fuel producers to separate upon certification of a neat batch of renewable jet would alleviate these constraints. Moreover, it would facilitate producers' ability to deliver renewable jet to consumers at closer to conventional jet price parity by providing the producer the opportunity to market the separated RINs to the broader pool of obligated parties Such a change would provide much-needed near-term federal policy support for a growing renewable jet fuel sector and benefits for U.S. airlines and their passengers.

Finally, we ask that the EPA clarify the proposed definition of "renewable jet fuel". EPA has proposed that "renewable jet fuel" means "renewable fuel that meets ASTM D7566". As EPA knows, standard D7566 requires blending of various types of neat renewable jet fuels, described in the annexes of ASTM D7566, with conventional jet fuel. The proposed definition risks treating the *blender* of renewable jet as the producer/RIN generator (and would foreclose the opportunity for RIN separation we've describe above). For more information on this, see the comments under section E-1 below.

These proposals—(1) increasing the equivalence value for renewable jet fuel and renewable naphtha to 1.8 RINs per gallon and (2) allowing renewable jet fuel producers to bundle renewable jet fuel RINs to 2.5 RINs per gallon of each renewable jet fuel sold—could be implemented with a sunset of two years. Although these proposals could be in place for longer, a two-year window would allow EPA to test and review the program to see progress made prior to 2028.

Our associations appreciate the opportunity to comment on this proposal, which we hope will help send a robust investment signal and enable achievement of our shared goal of American energy dominance. Clear and uniform direction is critical to industry success, and we look forward to supporting EPA in the development of the SET2 proposal that best meet the needs of a growing domestic renewable jet fuel industry. We request the opportunity to meet with your team to discuss these comments and look forward to working with you to implement these foundational SAF policies.

[2] See 40 CFR 80.1429(b)(1) and (b)(2)

Our associations also applaud EPA's proactive approach to seeking opportunities for feedback related to SAF and business aviation to best provide incentivization that meets the needs of the broader industry. We look forward to working with you on these important provisions that will create necessary opportunities for a new energy industry.

As always, we welcome the opportunity for additional engagement on this rule and to support the best decisions as the Agency moves toward finalizing the actions contained in it. Thank you for your attention and strong consideration of these very important matters.

Sincerely,

General Aviation Manufacturers Association (GAMA)
National Air Transportation Association (NATA)
National Business Aviation Association (NBAA)
Vertical Aviation International (VAI)