August 8, 2025

EPA-HQ-OAR-2024-0505
US Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Avenue
Washington, DC 20460

Submitted electronically via www.regulation.gov

Re: Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes, EPA-HQ-OAR-2024-0505

BP America Inc. (bp)[1] is pleased to submit comments in response to the US Environmental Protection Agency's (EPA) proposed rule outlining the Renewable Fuel Standards (RFS) for 2026 and 2027, among other proposed changes ("Proposed Rule").

About bp

bp is proud to be one of the few companies in the world with the people, technology, partnerships, high-quality assets, and trading capability to help deliver – at scale – energy to the world, today and tomorrow.

The United States (US) is at the heart of bp's strategy – we have roots in the US that go back more than 150 years. All of bp's major businesses are active in the US, where we employ over 30,000 people and spend more than 40 percent of our capex ($6.6 billion of $16.2 billion globally in 2024).

bp has been an active participant in the RFS program in a variety of roles: as an obligated party, a biofuels blender and producer, a biogas provider, and a Renewable Identification Number (RIN) marketer.

We appreciate the tremendous effort EPA put into this Proposed Rule. bp's comments fall into three main areas:

1) bp supports higher volumes in all renewable fuel categories that align with domestic production capacity and net imports and believes that small refinery exemptions (SREs) should not dilute these volumes.
2) bp encourages EPA to establish a more analytic basis for the proposed reduction of RINs generated from imported feedstocks.
3) bp encourages EPA to consider implementing new pathways that would accommodate higher volumes of cellulosic biofuel to incentivize additional growth in this area.

Additionally, bp offers its recommendations to EPA on issues affecting regulatory reporting and operations for biogas, the definition of "produced from renewable biomass," the proposed

[1] BP America Inc. is a subsidiary of BP plc. "bp" is used interchangeably herein to refer to BP America Inc., BP plc, other subsidiaries of BP plc, or the group of companies collectively.

removal of renewable electricity from the RFS program, and the inclusion of co-processing pathways to allow refineries to produce more American energy.

1. bp supports higher volumes in all renewable fuel categories that align with domestic production capacity and net imports and believes that SREs should not dilute these volumes (A-1,3-5).

bp supports growth in the RFS program across all technologies and feedstocks. The following sections detail how bp believes EPA could account for higher volumes in each statutory category.

D3 Cellulosic Advanced (A-3):
While bp agrees with EPA's model assessing Compressed Natural Gas (CNG) vehicle growth, bp does not agree with the use of this model alone to set future statutory volume mandates. bp believes that EPA must contemplate the approval of new pathways for growing renewable natural gas (RNG) demand when setting volumes, allowing RNG demand projections to be decoupled from CNG growth. The Proposed Rule does not align with the ambitious growth targets initially set by Congress for the cellulosic category in the Energy Independence and Security Act of 2007.

bp supports EPA using the policy tools available in the RFS to set more ambitious cellulosic volume targets. The Cellulosic Waiver Authority, and specifically the resulting Cellulosic Waiver Credits (CWCs), when implemented in a timely manner, allow for the market to react and increase liquidity because compliance buyers will have the necessary clarity to buy rateably throughout the compliance period. However, in the event that RNG production exceeds proposed volumes, there is limited use of policy tools available to increase mandates to meet higher production volumes.

An approach similar to EPA's approach to ethanol volumes setting may be appropriate. Setting the D3 category at expected future production levels creates an appropriate ambition for future years, encouraging demand growth for CNG/Liquified Natural Gas (LNG) and alternate pathways, just as a 15 billion (B) RIN implied conventional level encourages E15/E85 growth. Once into the compliance year, if it is clear that demand is limiting RIN generation, EPA can use the Cellulosic Waiver Authority and CWCs to reflect what the market is able to deliver in that compliance year.

When considering CNG/LNG demand growth compared to RNG production projections and the potential for new pathways, an increased volume mandate for the D3 category would support both upstream and downstream market growth. bp proposes the following volumes: for 2025: 1.23 B RINs, 2026: 1.35 B RINs, and 2027: 1.45 B RINs. These volumes would be supported by the new pathways as discussed below in bp's response to (A-3/D-1).

Corn kernel fiber (CKF) RINs are generated at the ethanol plant, and so volumes through this pathway should be calibrated to expected ethanol production, as opposed to ethanol consumption. EPA should further review the corn starch ethanol production capacity with the ability to produce ethanol from CKF and apply a 1% factor to the total corn starch ethanol production to better reflect potential CKF production.

D4-5 Non-cellulosic Advanced (A-4):

bp encourages EPA to set volumes that require at least 80% utilization (or 5.8 B physical gallons) of biomass-based diesel (BBD). We believe EPA's Proposed Rule is consistent with this utilization level.

Analysis from several independent sources show there is sufficient processing capacity and global feedstock to deliver up to 7.245 B gallons of non-cellulosic advanced biofuel, including through co-processing. Newer projections for renewable diesel (RD), sustainable aviation fuel (SAF), and renewable naphtha capacity growth have been published since EPA's Proposed Rule was published in the Federal Register. For example, Farmdoc Daily estimates RD and SAF production at 5.261 B gallons by 2026.[2] Combining 5.261 B gallons of RD capacity with the Energy Information Agency (EIA) projection of biodiesel (BD) capacity (1.984 B gallons[3]) yields a total domestic production nameplate capacity for lipid processing of 7.245 B gallons. bp strongly encourages EPA to set volumes that require at least 80% utilization, or 5.8 B physical gallons, of BBD.

bp agrees with the EPA that there will be insufficient domestic feedstock production to generate the 8.8 B and 9.3 B RINs obligated parties will require for compliance in 2026-27. These numbers include the contribution of RD produced through coprocessing. The fewest number of gallons required to meet the Proposed Rule volumes using only domestic feedstocks and production capacity is approximately 5.6 B and 5.9 B gallons in 2026 and 2027, respectively. Meeting this volume would require 44.8 and 47.4 B pounds of domestic feedstocks in 2026 and 2027, respectively. bp's understanding is that only 32.8 B lbs and 35.4 B pounds of domestic feedstock supply in 2026 and 2027, respectively, will be available for conversion to biofuels as detailed in the Appendix at Table 1. This amount of feedstock would support approximately 4.10 B and 4.43 B gallons of BBD in 2026 and 2027, respectively, which is slightly lower than EPA's estimate of 4.3 B and 4.6 B gallons of BBD from domestic feedstocks.

bp agrees with EPA's conclusion in the Proposed Rule that recent announcements for new crushing facilities have the potential to significantly increase the amount of soybean oil available for biofuels conversion[4]. Recent analysis by the US Department of Agriculture (USDA) projects soybean oil crush capacity to grow substantially in market year (MY) 2024/2025, up to 3 B bushels/year.[5] In addition, numerous facilities are scheduled to be operational from September 2025 through December 2026, which would further increase soybean oil production and

[2] Maria Gerveni, Todd Hubbs, Scott Irwin and Steven Ramsey, Estimates of Sustainable Aviation Fuel Production Capacity at U.S. Renewable Diesel Plants Through 2026. farmdoc daily, Jan. 8, 2025.
[3] U.S. Energy Information Administration, Monthly Biofuels Capacity and Feedstocks Update (2025).https://www.eia.gov/biofuels/update/ https://www.eia.gov/biofuels/update/.
[4] Proposed Rule at 25802
[5] Maria Bukowski, Bryn Swearingen, and Todd Hubbs, *Oil crops outlook: February 2025*. Economic Research Service, U.S. Department of Agriculture (2025). https://ers.usda.gov/sites/default/files/_laserfiche/outlooks/110935/OCS-25b.pdf?v=41523.

availability to biofuels to 3.10 B bushels/year (bu/yr) by end of calendar year (CY) 2025 to 3.34 B bu/yr by end of CY 2026 (for a complete list of upcoming facilities, please see the Appendix at

Table 2)[6]. The most recent USDA crop yearbook out to 2034 projects soybean oil for food, feed, and industrial uses to account for approximately 14.4 B pounds in compliance years 2026-2027, leaving approximately 18.4 B pounds and 21 B pounds of soybean oil available for biofuels.[7] The proposed RIN reduction for imports incentivizes diversion of soybean oil from other uses to biofuels.

The USDA Foreign Agricultural Service indicates that domestic canola/rapeseed oil production has increased from 673 thousand metric tonnes (kMT) (1.5B pounds) in 2021/22 to 897 kMT (2.0B pounds) in 2025/26.[8] With the incentives in the Proposed Rule for domestic conversion of oilseeds to biofuels, this domestically produced canola oil could generate approximately 250 million (M) gallons of BBD using EPA's conversion of eight pounds of oil/gallon of fuel. The USDA also projects 4,635 kMT of Canadian canola/rapeseed oil production in 2025/26. This could be used to produce over 1.3 B gallons of BBD if made available to domestic markets. However, as EPA notes in the Proposed Rule, the Canadian government also has a biofuels program that will increase demand for Canadian canola oil. Using EPA's estimates, the Canadian biofuels program will require approximately 0.5 – 0.6 B gallons of BBD in through 2027. This would leave a maximum of approximately 0.7 – 0.8 B gallons of BBD available to be imported to the US, notwithstanding other potential users.

Assuming EPA's analysis is accurate, 4.319 B and 4.619 B gallons of domestic BBD feedstocks are available for 2026 and 2027, respectively, which would generate approximately 6.8 B and 7.2 B RINs, respectively, out of the approximately 8.8 B and 9.3 B RINs required by the RFS Program. That leaves imported feedstocks or fuels to produce approximately 2.1 B RINs in 2026-2027.

D6 Total Renewable Fuel (A-5):

bp supports EPA's approach to setting total renewable fuel volumes and notes that volumes should increase when EPA updates ethanol volumes in line with the Energy Information Agency's latest estimates.

SREs should not dilute 25 B RIN total volume

bp supports EPA's previous analysis that RIN pass-through costs prevent any single refinery from experiencing disproportionate economic hardship and that "on average these 24 small refineries paid 1.1% (1.2¢) more per RIN when buying separated RINs when compared to the average daily price and 0.5% (0.6¢) more per RIN than the largest 20 refiners."[9] As such, bp does not support the granting of SREs. If EPA does grant SREs, bp urges EPA to carefully

[6] *Id.*
[7] Office of the Chief Economist, World Agricultural Outlook Board, U.S. Department of Agriculture, Interagency Agricultural Projections Committee, *USDA Agricultural Projections to 2034*. (2025). https://ers.usda.gov/sites/default/files/_laserfiche/outlooks/110966/OCE-2025-1.pdf.
[8] Foreign Agricultural Service, U.S. Department of Agriculture, *Production, Supply and Distribution (PSD) database (July 2025).* https://apps.fas.usda.gov/psdonline/app/index.html#/app/home.
[9] U.S. Environmental Protection Agency, *An Analysis of the Price of Renewable Identification Numbers (RINs) and Small Refineries* (December 2022), at 1. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1016CAA.pdf.

consider an approach that will limit unintended consequences for competition, consumers, and energy security.

First, presuming exempted volumes are reallocated, RIN prices will increase as each gallon of renewable fuel from an obligated party needs to contribute more to maintain the required RIN level needed to incentivize production and blending. As previous EPA analysis shows, this price is efficiently passed through to consumers, raising gasoline and diesel prices for US consumers and companies.[10]

Second, at current RIN prices, a full exemption offers a refinery an uplift of almost $7/barrel (bbl) – while the CME reported refinery crack is $27/bbl.[11] As such, the value from exemptions can substantially impact fossil fuel competitiveness where small refineries compete head-to-head with other refineries. This also would create windfall profits for exempted refineries (greater than $100 million per year for many refineries[12]), harming competitors who do not receive SREs through direct competition or competition for shareholders.

Finally, medium-sized refineries may choose to run under capacity to get below the 75kbd threshold to qualify for an SRE. Indeed, if a 100kbd refinery made an $18/barrel (bbl) crack (about the level in 2024), it would make just as much money running 75kbd and collecting a ~$6/bbl exemption. This could harm energy security locally and nationally.

bp suggests that EPA consider the following in developing its SRE approach:

If EPA intends to change its SRE methodology, EPA should make the proposed changes available for public comment. Advanced notice of changes also enables the industry to react to the changes in an orderly manner.

EPA should consider granting partial relief as past analysis shows refineries experience increased costs of only 1.1% on average[13], so exempting 100% of the volume is excessive. EPA has already indicated it "intends to grant relief consistent with DOE's recommendations where appropriate. This policy extends to DOE's recommendations of partial (50%) relief: Where appropriate, we intend to grant 50% relief where DOE recommends 50% relief."[14] This logic could be further extended to establish lower percentages that better match EPA and DOE analyses of actual increased costs.

Any reallocation should be prospective and not retroactive. If EPA concludes that SREs are required for past years and reallocation were to occur, such reallocation should be applied to future years as a supplemental volume. Similarly, if EPA expects to grant SREs in the covered (2026-2027) compliance years, bp recommends EPA reallocate the highest feasible volume when calculating the percentage standards for those compliance years such that any volume that might be exempted is accounted for and that the overall volume mandate of the RFS

[10] U.S. Environmental Protection Agency, *Proposed RFS Small Refinery Exemption Decision* (December 2021), at 44. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1013KMM.pdf
[11] OPIS reports RFS RIN RVO on July 29, 2025, is 16.586cpg. Multiplied by 42 gallons per barrel equals $6.97/bbl. CME reports 3:2:1 crack on July 29, 2025, as $27.3975.
[12] $7/bbl exemption times 75kbd capacity = $191,625m. 50kbd capacity = $127.75m.
[13] U.S. Environmental Protection Agency, An Analysis of the Price of Renewable Identification Numbers (RINs) and Small Refineries (December 2022), at 1. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1016CAA.pdf.
[14] Renewable Fuel Standard Program: Standards for 2020 and Biomass-Based Diesel Volume for 2021 and Other Changes, 85 FR 7016 (Feb. 6, 2020).

program is maintained without the need for future EPA action. EPA should not retroactively reallocate volumes or revise RFS percentage standards.

2. bp encourages EPA to establish a more analytic basis for the proposed reduction of RINs generated from imported feedstocks (B-1).

bp appreciates EPA's desire to bolster domestic feedstock production. However, bp seeks further clarification on the rationale behind the 50% reduction in the number of RINs generated by imported feedstock as stated in the Proposed Rule. This percentage appears to have been selected without providing sufficient analysis and justification in the Proposed Rule. bp recommends EPA provide a more robust analysis and explanation for setting the proposed RIN reduction percentage. This explanation should consider the statutory factors the EPA is required to evaluate.

To establish such a basis, bp encourages EPA to consider the diverse factors impacting the competitiveness of different feedstock sources including tax credits, state low carbon fuel standard (LCFS) programs, the price of the different sources over time, transportation costs, global market conditions, etc. With an understanding of these factors, EPA can then set a percentage that will meet program priorities in all market environments. Providing a robust analysis of the reduction percentage would not only help balance the economic impacts of the program but also offer a more defensible legal basis for the change, thereby supporting program certainty.

bp discourages EPA from considering alternatives where feedstock from certain countries is treated the same as US feedstock. This is not contemplated in Clean Air Act (CAA) Section 211. bp agrees with EPA's statement in the Proposed Rule that "domestic-based renewable fuels – manufactured under the closely monitored US environmental standards – are preferable"[15] as it reduces the regulatory burden on regulated parties by simplifying traceability and verification requirements. bp recommends that EPA provide an analysis and explanation for differential treatment for any foreign entities it might consider.

bp is concerned with the RIN reduction rule implementation timing and the regulatory burden arising from new recordkeeping and attest requirements in the rule. The final rule must have clear directions and readily available solutions to avoid any delays in implementation, which could present difficulties for the market and for renewable fuel producers who rely on RIN monetization to meet operational costs. To reduce regulatory burden and ease implementation, EPA should no longer require producers to retain other companies' proprietary records. Instead, EPA should provide guidance for third-party attest providers using a risk-based approach. Alternatively, EPA should formalize third-party recordholders in the RFS program by requiring them to apply, register, and be approved to retain records on behalf of biofuels producers, including being liable for compliance.

[15] See Proposed Rule at 25840.

3. bp encourages EPA to consider implementing new pathways that would accommodate higher volumes of cellulosic biofuel to incentivize additional growth in this area. (A-3/D-1).

bp appreciates the analysis EPA completed of the CNG downstream fueling market as a factor in determining RNG growth. However, the RNG industry continues to develop facilities through continued investment. With the acquisition of Archaea Energy in 2023, bp is one of the largest RNG producers in North America. Additionally, bp is invested in the development of dairy RNG projects through a joint venture with Clean Energy Fuels Corporation called CE bp Renew Co, LLC, which owns and operates five projects in the Midwest and one on the West Coast. For continued investment and development that supports agricultural communities, it is important for EPA to approve new pathways that allow for RNG utilization.

RNG can be used in the production of other transportation fuels through the utilization of renewable hydrogen. Pathways that would allow for RNG to realize value from renewable hydrogen production would unlock incremental value for the market, enabling growth opportunities. For example, EPA has proposed changing the equivalency value of RD from 1.7 RINs/gallon to 1.6 RINs/gallon due to the fossil natural gas used in hydrogen production[16]. In this scenario, an RD producer could offtake RNG, using the mass balancing allowed in the RFS program, to allocate RNG to natural gas demand at the production point for hydrogen within the RD process. The demand for RNG in this pathway would significantly increase to meet the anticipated growth of the RNG industry. Another way for EPA to increase RNG demand would be for EPA to approve a pathway for RNG to be allocated into the natural gas demand for hydrogen production within petroleum refineries. If these new pathways were approved, it would allow RNG demand to grow independently of CNG demand. It would also let the market determine what types of vehicles people buy.

4. Additional recommendations

Recommendations on biogas regulatory reporting

bp appreciates EPA's work to verify compliance for RNG producers. bp manages one of the largest RNG portfolios in North America. Implementing the recommendations below would align EPA guidance with industry best practices:

- 40 CFR § 80.1426(e): EPA has included proposed requirements for how RINs from RNG are assigned. bp suggests that the below replace the proposed requirement:

  We are also proposing that RINs for RNG that are gaseous at STP be assigned to a volume of RNG at the same time the assigned RIN is generated. Additionally, renewable fuels that are gaseous at STP should be assigned to a volume of RNG at the same time a separated RIN is generated for the renewable fuel.

- 40 CFR § 80.1426(e): EPA has proposed a definition of RNG that should include the following characteristic of the product produced:

[16] Proposed Rule at 25843.

(4) Eligible RNG, after pipeline injection, is an assigned RIN pursuant to § 80.125(c), until RIN separation.

- 40 CFR § 80.125(c): The section titled "RINs for RNG" includes requirements for RIN assignment and transfer that refer to renewable fuels, despite RNG processes differing from liquid fuels. The clarification on RIN transfers should be updated to reflect the following:

  (3) Each party that transfers title of an assigned RIN with a K code of 3 to another party is deemed to have also transferred title of an appropriate volume of RNG to the transferee so long as the assigned RIN represents a specific volume of RNG injected into the natural gas commercial pipeline system as described in paragraph (c)(1) of this section and the specific volume of RNG is not double counted as described at 80.185(c).

- 40 CFR § 80.1428: This section includes a reference to the need for RIN ownership to be transferred with the ownership of renewable fuel. In this section, there should be an exception included that would allow for RINs from RNG to be transferred without the corresponding fuel, given current operations for RNG specifically. We propose the following language be included to clarify the operational nuance:

  (2) A RIN is assigned to a volume of RNG or renewable fuel and when ownership of the RIN is transferred so is the transfer of ownership of the volume of RNG or renewable fuel, pursuant to § 80.1428(a).

- 40 CFR § 90.1460: In the section titled "What acts are prohibited under the RFS program?", EPA proposed requiring transfer of a K1 or K3 RIN without transferring the same amount of renewable fuel in the same day to be a prohibited activity. Gaseous fuels are bifurcated from RIN activity and K3 RINs will not have the renewable fuel transferred on the same day, as the timing between natural gas and associated RINs is different. We would propose changing this section to include:

  (4)(i) Transfer to any person an assigned RIN with a K code of 1 without transferring an appropriate volume of renewable fuel to the same person on the same day.

  (ii) Transfer to any person an assigned RIN with a K code of 3 without transferring an appropriate volume of RNG to the same person.

In the Proposed Rule, EPA included changes to sampling and testing requirements that would introduce compliance difficulties for the RNG industry due to differences in operations compared to other renewable fuels. The following are proposed updates to accommodate the compliance needs of the RNG industry:

- 40 CFR § 80.155: This section introduces an annual testing requirement for RNG facilities.

  We believe that this should be a triennial requirement that aligns with the facility's three-year engineering review update. RNG facilities are required to meet the specifications of the natural gas pipeline that is being injected into and are continuously

tested for pipeline access. If an RNG facility is not meeting pipeline specifications, they are not able to inject into the pipeline and the volume is not reflected on pipeline statements that determine RIN generation.

In this section, EPA also lists a select number of standards to be included in the final Set 2 rule. This list is not inclusive of the list of standards that have been previously approved, and as such we recommend that all approved standards also included in the final rule. The full list of standards we suggest be included in the final Set 2 rule:
ISO 14511 Measurement of fluid flow in closed conduits — Thermal mass flowmeters
o ASME MFC-11 Measurement of Fluid Flow by Means of Coriolis Mass Flowmeters
o ISO 10790 Measurement of fluid flow in closed conduits – Guidance to the selection, installation, and use of Coriolis flowmeters (mass flow, density, and volume flow measurements)
o ISO 17089-1 Measurement of fluid flow in closed conduits – Ultrasonic meters for gas, Part 1: Meters for custody transfer and allocation measurement
ISO 11631 Measurement of fluid flow

This section seeks to create OIML calibration standards for measurements devices. However, given the diversity of devices used in RNG production, the proposed rule should include guidance that defers to the OEM standards by device. RNG Producers using differential pressure (DP) transmitters and V-Cones will be directly affected by the proposed requirement under OIML R137-1 and 2. Removing the V-Cone and transmitter assembly to ship it out for calibration and certification as a combined system would create significant logistical challenges and added costs. The entire combination would need to be calibrated and certified together, which is not standard practice today and would have a direct impact on operations and budgets. By design, these DP measurement systems are inferential and do not directly measure gas volume. Specifically: The PMD75 is a differential pressure transmitter, not a gas meter. The V-Cone is a primary flow element that creates a pressure drop used to calculate flow, relying on ISO 5167 or AGA Report No. 3 as the measurement standard — not OIML R137.

In the Proposed Rule, EPA proposes that all RINs must be separated by March 31 of the subsequent year that the RNG RIN was generated. bp believes that RINs that have not been separated should be retired at the end of the compliance year. However, the end of the compliance year is not always March 31 (for example, December 1, 2025, is the 2024 compliance deadline). The Proposed Rule should be updated to reflect the potential for the compliance year to change from the original March 31 deadline.

bp supports EPA's proposed change that would allow registration for independent third-party auditors to take place every other year, compared to the current process of annual registration. The current annual process is disruptive to the industry because auditors are time constrained addressing EPA concerns.

<u>bp encourages EPA to avoid undue complexity in defining what is "produced from renewable biomass" (E-3)</u>

bp supports EPA's decision to change the equivalence value for RD, naphtha, and jet while not offering a new definition of "produced from renewable biomass." We support EPA's effort to maintain a broad and flexible approach to this definition, which allows the greatest number of technologies to compete for RFS participation, using GHG lifecycle performance and equivalence value calculations as the analytical tests for qualification and awarding RINs.

Recommendation regarding the proposed removal of renewable electricity from the RFS program (C-1,2)

bp supports the inclusion of eRINs within the RFS program and believes EPA should reconsider the elimination of this component. EPA has statutory authority to issue a final rule on eRINs, as these credits play a crucial role in promoting the development and production of renewable electricity derived from biomass. By removing electricity from the program using the language set forth in the Proposed Rule, EPA will stifle innovation, reduce energy security, and potentially exclude other fuel sources.

bp supports inclusion of co-processing pathways to allow refineries to produce more American energy (E-7).

bp does not support EPA's definition of "renewable jet fuel" in the Proposed Rule, which fails to include fuel certified through ASTM D1655, Annex A1.

Conclusion

bp appreciates the opportunity to provide these comments to EPA, and we look forward to continuing our discussions on this important rulemaking. Please feel free to contact Andrew Vlasaty at Andrew.Vlasaty@bp.com,Mark Borowski at Mark.Borowski1@bp.com, or Tom Miller at Thomas.E.Miller@bp.com if you have any questions.

Sincerely,

/s/ Andrew Vlasaty

Andrew Vlasaty
Head of Policy Advocacy and
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Appendix

Table 1: List of New Soybean Crush Facilities Scheduled to Begin Production in 2025-2026

Start-Up Year	Party	City	State	Capacity
2025	Marquis[17]	Hennepin	IL	80 bu / year
2025	AGP[18]	David City	NE	50 bu / year
2025	SDSP[19]	Mitchell	SD	100 kbu / day
2026	LDC[20]	Upper Sandusky	OH	175 kbu / day
2026	Incobrasa[21]	Gilman	IL	40 bu / year
2026	Epitome[22]	Grand Forks	MN	42 bu / year
2026	Bunge[23]	Cairo / Destrehan	IL / LA	7,000 tons / day
2026	CHS[24]	Evansville	WI	70 M bu / year

Table 2: Summary of Domestic Feedstock Availability in 2026-2027

Feedstock	2026 Supply (B lbs oil / B gallons of BBD)	2027 Supply (B lbs oil / B gallons of BBD)
Grease	3.6 / 0.45	3.6 / 0.45
Tallow	3.9 / 0.49	3.9 / 0.49
Corn Oil	4.5 / 0.56	4.5 / 0.56
Canola Oil	2.0 / 0.25	2.0 / 0.25
Soybean Oil	18.4 / 2.30	21.0 / 2.63
Other	0.4 / 0.05	0.4 / 0.05
Total	**32.8 / 4.10**	**35.4 / 4.43**

Basis and References

[17] Marquis Energy, *Marquis Announces Acquisition of Permits for the Marquis South Dock Expansion Project to Accommodate Soybean Crush Facility* (July 5, 2023). https://marquisinc.com/2023/07/05/marquis-announces-acquisition-of-permits-for-the-marquis-south-dock-expansion-project-to-accommodate-soybean-crush-facility.
[18] Midwest Messenger, S*oybean processing facility coming to David City in 2025* (Feb. 13, 2022). https://agupdate.com/midwestmessenger/news/crop/soybean-processing-facility-coming-to-david-city-in-2025/article_2d3523e4-8077-11ec-9a87-dfc733b1ee1e.html.
[19] South Dakota Soybean Association, *New soybean processing plant to be operational by fall '25*. (Sept. 12, 2023). https://www.sdsoybean.org/news-media/new-soybean-processing-plant-to-be-operational-by-fall-25.
[20] Jennifer Kiehl, *Louis Dreyfus Co. breaks ground on Ohio soybean processing plant* (July 18, 2024). https://www.farmprogress.com/soybean/louis-dreyfus-co-breaks-ground-on-ohio-soybean-processing-plant.
[21] Sara Samora, *Incobrasa breaks ground on $250M soybean plant expansion*. (Sept. 22, 2023). https://www.agriculturedive.com/news/soy-bean-processor-Incobrasa-Industries-breaks-ground-on-250m-gilman-illinois-plant/694489/.
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[23] Biomass Magazine, *Chevron, Bunge Announce Definitive Agreements to Create Joint Venture* (Feb. 22, 2022). https://biomassmagazine.com/articles/chevron-bunge-announce-definitive-agreements-for-joint-venture-18751.
[24] Larry Lee, *Wisconsin farmers await first soybean processing plant* (July 8, 2024). https://www.brownfieldagnews.com/news/wisconsin-farmers-await-first-soybean-processing-plant/.

Grease: Sum of survey data of yellow grease, choice white grease, and grease (excluding yellow, white, and wool) in latest years available. Assumed constant production. Data from https://quickstats.nass.usda.gov/.
Tallow: Survey data of 2024 production of inedible tallow from https://quickstats.nass.usda.gov/.
Corn Oil: USDA Oil crops yearbook projection for MY 2024/2025. (U.S. Department of Agriculture, Economic Research Service. (2025). Oil crops yearbook [Data set]. U.S. Department of Agriculture, Economic Research Service.).
Canola Oil: July 2025 forecast for rapeseed oil production for MY 2025/2026. From U.S. Department of Agriculture, Foreign Agricultural Service. (2025). *Production, Supply and Distribution (PSD) database*. Retrieved 7/24/2025], https://apps.fas.usda.gov/psdonline/app/index.html#/app/home
Soybean Oil: See Section A-4.
Other: Sum of Poultry and Other categories reported for 2024 under U.S. Energy Information Administration (EIA). (2025). Monthly Biofuels Capacity and Feedstocks Update.