Sustainable Advanced Biofuel Refiners (SABR) Coalition – Who We Are

Sustainable Advanced Biofuel Refiners (SABR) is a coalition of stakeholders that have invested in building out America's first advanced biofuel—biodiesel. Biodiesel is the most cost-effective means to reduce greenhouse gas (GHG) emissions from medium- and heavy-duty vehicles, providing numerous economic, environmental, and energy security benefits. It is produced from renewable resources, including, but not limited to, soybean oil, used cooking oil, and animal fat. SABR includes stakeholders from every link in the value chain from feedstock growers to biodiesel producers, distributors, retailers, and consumers, as well as infrastructure and products and services suppliers.

These stakeholders, mostly small businesses, have invested heavily in meeting the nation's goals of the Renewable Fuel Standard (RFS) program. Congress specifically considered and included biodiesel under the RFS program. However, EPA's current implementation requires biodiesel to compete with renewable diesel (RD) and sustainable aviation fuel (SAF) in the biomass-based diesel category, despite various regulatory advantages given to these fuels under the RFS program. These advantages have been exacerbated by the Inflation Reduction Act (IRA), which recently authorized higher tax credits for SAF, and by the California Low Carbon Fuel Standard (LCFS), which has resulted in directing RD and SAF to the West Coast, undermining the *national* goals of the RFS program and eliminating the local and regional economic and environmental benefits provided by a vibrant biodiesel industry.

Under the RFS program, Biodiesel use in the United States grew from 300 million gallons in 2010 to 2.3 billion gallons in 2016. But, since then, new gallons of RD and SAF have caused biodiesel volumes to shrink every year to 1.6 bgy of domestic production in 2022, which is taking a step backward. This trend is accelerating. It is important to recognize that RD, SAF and biodiesel do not "compete" in the marketplace through customer choice, price, and performance; under the current RFS they compete in the "biomass-based diesel" (D4) category but that is the only commonality. In this category, RD and SAF are given very different energy and tax policy treatments and, as in the case of SAF, compete in different markets. This contrived competition is not leading to more efficient, lower cost carbon reduction. On the contrary, rather than being additive under the current RFS implementation, biodiesel—the lower cost, lower carbon, cleaner-burning fuel currently being produced predominantly from soy/canola — is being displaced by higher cost, higher carbon fuels.

We believe these policies are also disadvantaging soybean oil, directing waste oils to RD and SAF production. EPA also requested comment on how to include carbon intensity scores in the RFS program, which will further disadvantage soybean oil.

SABR was formed to advocate adjustments to the RFS program that would allow fuels to compete on a more level playing field. As EPA has argued that the overall advanced biofuel volumes are driving RD, we have recommended recategorizing RD and SAF to be in the "undifferentiated" advanced biofuel category rather than the biomass-based diesel category so that these new fuels can continue to be incentivized but actually grow the overall volumes and support investment in new and sustainable feedstocks. This is common-sense policy that is consistent with the statute and will further the goals of Congress.

SABR is also seeking to ensure an all of the above energy policy that includes biodiesel and a diversity of feedstocks that includes crop-based fuels, particularly soybean oil to support sustainable fuels and feedstocks, reduce GHG emissions today and in a cost-effective manner, promote environmental justice, ensure competition, and promote energy security.

For questions about SABR contact Joe Jobe at joe@rockhouse.us

The following organizations are members of or support the goals of SABR.

Iowa Renewable Energy

Imperial Western Products

Western Dubuque Biodiesel

Blue Ridge Biofuels

W2 Fuels

Incobrasa Industries

RBF

Ever Cat Fuels

Kentucky Soybean Association

Baker Commodities

Cape Cod Biofuels

Scott Petroleum

Thumb Bioenergy

Walsh Biofuels

Chemol

Verbio

Northeast Biodiesel

BDI-BioEnergy International

Good Steward Biofuels

Owensboro Grain

Rio Valley Biofuels

Pacific Biodiesel

Bioenergy Development Group

Venture Commodities, Inc.

SmartTank, Inc.

Clean Energy Biofuels

Virginia Biodiesel Refinery, LLC

Lincoln Energy Solutions

Targray

Plasma Blue

Columbus Foods

Canary Biofuels

Musket

Encore BioRenewables

Solutions 4 Manufacturing

Springboard Biodiesel

RW Heiden Associate, LLC

Evonik

Mid-Atlantic Soybean Association (DE, PA, MD, NJ)

National Association of Truck Stop Operators (NATSO)