



September 9, 2025

The Honorable Shelley Moore Capito
Chair
Committee on Environment and Public Works
U.S. Senate
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Sheldon Whitehouse
Ranking Member
Committee on Environment and Public Works
U.S. Senate
410 Dirksen Senate Office Building
Washington, DC 20510

Dear Chair Capito and Ranking Member Whitehouse:

As retailers and distributors of advanced, low-carbon renewable liquid fuels, we have a long track record of supporting energy tax policies that strengthen domestic energy security, reduce fuel costs for consumers, and lower transportation-related emissions. We write to you today to express our opposition to the Renewable Fuel for Ocean-Going Vessels Act as currently drafted.¹

The trucking, home heating oil, and rail industries all rely on a steady supply of biodiesel and renewable diesel facilitated by the Renewable Fuel Standard (RFS) to help lower the cost of the fuel. The Renewable Fuel for Ocean-Going Vessels Act (S. 881), though well-intentioned, would allow marine biofuels to generate credits under the RFS without creating a Renewable Volume Obligation (RVO) for petroleum-based marine fuel. This would confer an unearned compliance advantage on marine fuel producers by awarding them Renewable Identification Numbers (RINs) untethered to any proportional obligation.

Congress should avoid incentivizing additional renewable marine fuel production solely through RFS credits. This asymmetry would serve only to siphon feedstock and renewable fuel gallons away from the over-the-road sector and to the marine sector. This is because renewable marine fuel relies on the same limited feedstocks as over-the-road renewable fuels. Allowing renewable marine fuel producers to monetize RINs without an obligation depresses incentives to produce over-the-road biofuels and will *reduce* overall biofuel consumption.

If existing biodiesel production capacity is diverted to new marine fuel production, diesel prices will increase, and Americans will pay more for all goods transported by truck. Retail diesel markets, particularly in the Midwest, are already facing inflationary pressures as a result of the recent expiration of the Section 40A Biodiesel Tax Credit at the end of 2024 and continued implementation delays of the Section 45Z Clean Fuel Production Credit.

¹ “Ricketts, Klobuchar Introduce Renewable Fuel for Ocean-Going Vessels Act,” Senator Pete Ricketts, March 6, 2025, <https://www.ricketts.senate.gov/news/press-releases/ricketts-klobuchar-introduce-renewable-fuel-for-ocean-going-vessels-act/>.

If Congress is interested in allowing renewable marine fuel to qualify for credits under the RFS, it should also require obligated parties to assume an RVO for each gallon of petroleum-based marine fuel that they produce. Congress should also ensure that biodiesel generates more RINs on a per-gallon basis than renewable marine fuel.

Sincerely,

NATSO, Representing America's Travel Plazas and Truckstops
SIGMA: America's Leading Fuel Marketers

Cc: Members of the Environment and Public Works Committee