



February 2, 2022

Docket ID No. EPA-HQ-OAR-2021-0324

Dear Administrator Regan,

I'd like to take this opportunity to share the perspective of a medium-sized business owner on the recently-proposed "Renewable Fuel Standard ("RFS") volumes, and why I believe that the Environmental Protection Agency's ("EPA") proposal would saddle us with additional energy-related expenses at a time when these costs are already historically high. It's my hope that the EPA will consider making changes so that our region's refineries can continue to serve as a local source of reliable fuel production, which will help countless residents and business owners like me.

Asher's Chocolate Company ("Asher's") is a family-owned confection manufacturer that's been in business in Pennsylvania since 1892. Just like our regional refineries, many generations of families have relied on Asher's for their livelihoods. While we may not be the most well-known Pennsylvania-based candy company, we are recognized as one of the highest quality brands, and as a result, our products today can be found on the shelves of major grocery stores, small flower shops, Hallmark stores, and in numerous other locations throughout the country.

Asher's believes that the goals of the RFS are important because we deeply care about being good stewards of the environment. We have been certified as a landfill-free enterprise for over ten years, because environmentally-friendly waste management strategies are important to us. In addition, we continue to improve the ways that we reduce and reuse throughout our production and distribution supply chains all in an effort to continue lowering our carbon footprint.

Like countless other companies, we depend on the products that our area independent refiners produce in order to successfully run our business. The cost of energy in manufacturing is a variable cost that we pay close attention to as it has the potential to have significant impacts on our bottom line. Between the rising costs of utilities and now, transportation fuel expenses, we've seen a substantial increase in our energy costs. And I'm certain that our transportation fuel expenses would increase astronomically if area refiners were to go out of business.

Increases in energy costs, which are an unavoidable expense, often lead consumers and businesses to look for other ways in which they can cut expenses. While the fine chocolates that we produce are enjoyed by many families, we have seen how increases in the cost of living impact our business.

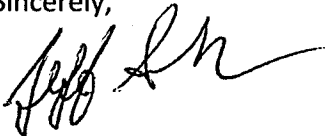
It's been reported that at least some of the costs associated with the RFS are passed on to consumers, and add roughly 20 cents per gallon to the cost of a gallon of gasoline. At a time when inflationary costs are hitting every facet of American society, a simple way for the administration to ease the pain at the pump for consumers and businesses alike would be to fix the RFS. Doing so would lead to benefits for businesses like mine and others.

In addition to the direct employees who work for our area refineries, numerous indirect employees rely on these facilities for their livelihoods. Refiners need a significant amount of support personnel and they depend upon a wide variety of manufactured goods in order to run their business. They are capital intensive facilities, regularly investing hundreds of millions of dollars annually on major project work, and they also infuse significant amounts of tax revenue into their local communities and the state.

One way that the EPA can ensure the success of the RFS, and lower gas prices, but without hurting refiners is to finalize blending volumes that more accurately reflect the realities of transportation fuel demand. The EPA can do so by reducing the 2022 proposed volumes to be more closely aligned with what the EIA projects fuel demand will be. The EPA could also further reduce the 2020 and 2021 volumes, and this would have the same effect of providing relief to refiners on their RFS compliance obligations.

We remain in uncharted waters as the pandemic continues to wreak havoc on our country and the world. Reliable access to fuel is not a luxury; it's a necessity that everyone depends upon, even manufacturers of chocolates. The vast majority of all products that people use are shipped via trucks to their final destination, so anything that increases fuel costs even further will add to the inflationary pain we are experiencing. I hope that the EPA takes a serious look at reducing the proposed renewable volumes. Doing so would have an immediate impact on the cost of fuel, which helps consumers and businesses, and also ensures the viability of our regional refiners.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Asher', with a long, sweeping flourish extending to the right.

Jeff Asher
President and CEO