

March 3, 2025

To Whom It May Concern:

I am writing on behalf of the Northwest Ohio Building and Construction Trades Council (“NWOBTC”) and its more than 15,000 members working in Northwest Ohio to express opposition to the Nationwide Consumer and Fuel Retailer Choice Act of 2025 (S. 593 this Congress/S. 2707 from last Congress) in its current form.

The poor structure of the federal ethanol mandate in the Renewable Fuel Standard, or RFS, has been a persistent threat to merchant refiners in Ohio and throughout the country for several years. It essentially requires independent refiners that do not operate in the part of the supply chain where ethanol can physically be blended into gasoline to buy tradeable credits from larger oil companies that have operations in every segment of the supply chain.

This structure, coupled with the fact that the Environmental Protection Agency (EPA) continues to mandate more ethanol than can be physically blended into the nation’s fuel supply, has frequently sent the cost of these RFS compliance credits – Renewable Identification Numbers or RINs – to astronomical levels. Skyrocketing RIN costs have historically contributed to refinery capacity reductions or closures. Many independent refiners spend more on RINs than all other operating costs combined. Such a situation not only threatens American fuel supplies, but union jobs. Independent refiners represent some of the most man hours for building and construction trades members in Ohio and across the nation. Additionally, experts have noted that RINs have historically added 20-30 cents per gallon to consumer fuel costs.

History proves you cannot look at E15 as a separate issue from the RFS. When the EPA tried to grant year-round E15 via regulation – a move that was overturned in court - the ethanol lobby used it as a justification to successfully convince the Agency to push the mandate higher. RFS advocates have continuously pointed to the desire to use E15 to push for higher ethanol mandates, which could once again result in the price of RINs skyrocketing, putting Ohio fuel supplies and jobs at risk. Given this threat, year-round E15 legislation **must** be paired with provisions to keep ethanol RIN costs in check,



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whether that be through a direct RIN cost cap, an adjustment of the volumes to match consumption or some other mechanism. The Nationwide Consumer and Fuel Retailer Choice Act of 2025 does not contain any such provisions. As a result, we oppose the legislation and urge you to do the same.

Sincerely,

A handwritten signature in blue ink, appearing to read "Shaun Enright", is written over a horizontal line.

Shaun Enright  
Executive Secretary/Business Manager  
Northwest Ohio Building Trades Council