June 12, 2023

VIA WWW.REGULATIONS.GOV

Karen A. Orvis
Chief Statistician of the United States
Office of Information and Regulatory Affairs
Office of Management and Budget
9215 New Executive Office Building
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Washington, DC 20503

ATTN: OMB-2023-0012
National Biotechnology and Biomanufacturing Initiative – Measuring the Bioeconomy

RE: Executive Order 14081 Advancing Biotechnology and Biomanufacturing Innovation for a Sustainable, Safe, and Secure American Bioeconomy—Request for Information; National Biotechnology and Biomanufacturing Initiative—Measuring the Bioeconomy, 88 Fed. Reg. 25,711 (April 27, 2023)

Dear Chief Orvis,

The Interagency Technical Working Group on the Bioeconomy (Working Group) is preparing recommendations regarding changes to the North American Industry Classification System (NAICS) and the North American Product Classification System (NAPCS) as part of an effort toward making an accurate measurement of the bioeconomy. For the last update to the NAICS, the Coalition for Renewable Natural Gas (RNG Coalition) submitted a proposal to the Office of Management and Budget (OMB) for updates to reflect new codes for the renewable natural gas (RNG) industry and RNG production facilities. We continue to believe that such codes are necessary to, as OMB notes, "inform Federal investments in research and development, guide private sector investments for scaling manufacturing efforts, assess emerging national and international economic opportunities, and foster the equitable distribution of health, food, and labor opportunities." 88 Fed. Reg. at 25,712. We are pleased to see that the Working Group recognizes "that NAICS/NAPCS classifications play a vital role in

both public and private sector business operations."[1] In response to this Request for Information, RNG Coalition again urges OMB to ensure RNG facilities are more accurately accounted for in the NAICS and that the Working Group make appropriate recommendations to support this effort.

I. Introduction and Background

RNG Coalition is a non-profit association founded in 2011 to represent and provide public policy advocacy and education for the RNG industry in and across North America. Beginning with just nine member companies, our current membership is now comprised of more than 380 member companies and entities who provide value across the entire industry supply chain. In addition to waste collection, waste management and recycling companies, engineers, consultants, law firms, financiers, organized labor, manufacturers, technology and service providers, gas/power marketers, gas/power transportation companies, fleets, fueling stations, airports and municipalities, utilities, and universities, RNG Coalition represents more than 95% of all RNG in the United States and Canada today. Together, we advocate for the sustainable development, deployment, and utilization of RNG so that present and future generations have access to domestic, renewable, clean fuel and energy.

A. The Renewable Natural Gas Industry

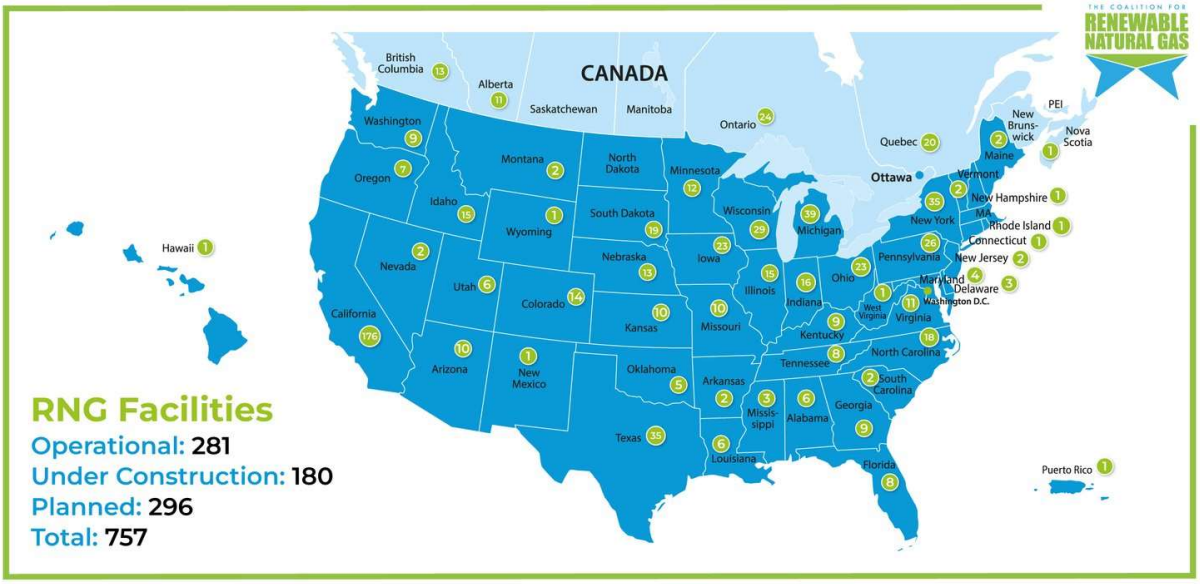
The first RNG facility was developed in 1982 at the Fresh Kills Landfill on Staten Island, New York. That facility continues to operate, produce and deliver RNG via NationalGrid's natural gas pipeline system for the benefit of thousands of ratepayers today. Between 1982 and 2011 only 30 additional RNG production facilities were developed (an average of one project per year). These projects were built as one-offs, largely taking advantage of federal tax credits and later, a variety of State Renewable Portfolio Standard (RPS) programs incentivizing the production of renewable power.

Although still a nascent industry in many respects, the growth and trajectory of our industry has dramatically increased since our organization coalesced the industry in 2011. Between the RNG Coalition's founding in 2011 and 2015, the RNG industry developed 16 additional projects—an average of four (4) projects per year, quadrupling the industry's annual project development average over the previous three decades dating back to 1982. Building on this, we announced an initiative in 2015 to, through effective advocacy and education, enable the industry to double the number of operating projects at the time (47) to 100 by 2025. The RNG industry achieved this objective in July 2019, more than five years ahead of schedule. In December 2019, RNG Coalition announced our new Sustainable Methane Abatement &

[1] U.S. Department of Energy, Bioenergy Technologies Office, *Office of Management and Budget Releases Request for Information on the U.S. Bioeconomy*, May 26, 2023, https://www.energy.gov/eere/bioenergy/articles/office-management-and-budget-releases-request-information-us-bioeconomy.

Recycling Timeline (SMART) for the RNG industry—an initiative for our industry to work with the full scope of the public and private sectors, with NGOs, unions, and universities in developing an action plan to capture and control the methane produced at more than 43,000+ aggregated organic waste sites across North America by 2050.[2]

At the time of the review for the 2022 NAICS update (May 2020), there were 113 operating RNG projects across the United States and Canada with an additional 37 projects under construction and another 62 projects in various stages of development. As of June 1, 2023, RNG Coalition reports 281 RNG facilities in operation with another 180 RNG facilities under construction. There is another 296 RNG projects in the planning stages. A list of these facilities is available at RNG Coalition's website—www.rngcoalition.com.



B. Renewable Natural Gas

For the 2017 NAICS update, the Economic Classification Policy Committee acknowledged the potential for continued growth of biogas production from anaerobic digesters. However, because the ECPC believed that biogas output at many installations is not the primary activity of the business unit and that biomass is used as a primary fuel source in the market production of electric power, it is important to distinguish the difference between biogas and RNG.

Biogas is a mixture of carbon dioxide and hydrocarbons, primarily methane gas, from the biological decomposition of organic materials. Biogas may be combusted on-site to generate sufficient renewable electricity to power operations. Depending on market conditions, renewable energy credits from excess biogas production have been sold, providing a return on

[2] For a description of the SMART Initiative, see attachment 1.

investment for biogas project developers and a royalty or additional revenue stream for the feedstock providers (farm, landfill, etc.). According to the U.S. Environmental Protection Agency's (EPA) Landfill Methane Outreach Program (LMOP), about 68 percent of currently operational landfill gas energy projects in the United States generate electricity.[3] This Administration is also seeking to increase demand for biogas to renewable electricity through the Renewable Fuel Standard (RFS) program.[4]

With respect to biogas and biogas production facilities, however, it is important to note that they are very different compared to RNG and RNG facilities. RNG, sometimes referred to as "biomethane," is a high-BTU product gas predominantly composed of methane and derived from biogas. The feedstocks that can be used to create RNG come from various sources. Large amounts of biogas can be collected, including from, but not limited to, existing biogas production facilities at landfills, wastewater treatment plants, commercial food waste facilities, and agricultural digesters (dairies, pig farms, etc.). RNG production facilities collect, clean and condition biogas that would otherwise be combusted to produce renewable electricity on-site, flared (literally wasted) in a thermal oxidizer, or, worse yet, escape fugitively into the atmosphere as a greenhouse gas (GHG) many times more potent than carbon dioxide. RNG facilities clean and condition biogas to remove most of the carbon dioxide, nitrogen and other trace constituents that prevent biogas from otherwise being injected into natural gas pipelines or dispensed as a fuel into natural gas vehicles. RNG is different from biogas in that significant capital is required to upgrade biogas to pipeline quality or transportation fuel grade, such that it can be blended with, or substituted for, geologic natural gas without any operational changes.

Unlike biogas, RNG can be sold for use as a drop-in vehicle fuel, for renewable electric power, and/or heat generation for in-home, commercial, and industrial uses. A shift toward increased production and greater utilization of renewable energy resources has been occurring throughout the country, due in large part to public policies enacted at the federal, state, and provincial levels over the past 15 years. In particular, federal programs like the RFS and state incentives such as California's Low Carbon Fuel Standard (LCFS) and Oregon's Clean Fuels Program (CFP) have succeeded in promoting and realizing increased use of low-carbon fuels from renewable sources in the transportation sector to improve fuel diversity, energy independence and security and reduce GHG emissions. Based on EPA data, RNG for transportation fuel use alone (not including other end-use applications) has grown from about 32 million ethanol-equivalent gallons in 2014 to over 665 million ethanol-equivalent gallons in

[3] EPA, *Basic Information about Landfill Gas*, https://www.epa.gov/lmop/basic-information-about-landfill-gas (Apr. 21, 2023).
[4] 87 Fed. Reg. 80,582, 80,583 (Dec. 30, 2022). RNG Coalition is supportive of implementing a biogas/RNG to renewable electricity pathway under the RFS program, which was first finalized in 2010 and revised in 2014. Implementation of the "eRIN" program is long overdue.

2022.[5] In addition, as this Administration has recognized, RNG can be used as a feedstock for production of other fuels, including, renewable diesel sustainable aviation fuel, methanol, and hydrogen.[6] Because of these increasing volumes, the U.S. Energy Information Administration (EIA) revised its annual natural gas supply and disposition survey to expressly include RNG.[7]

Unlike the biomass-derived biogas projects previously considered, our much larger RNG production facilities require substantial capital investments. "Total capital costs for smaller landfill projects are in the range of $5 million to $25 million, and upwards of $100 million for larger projects, including agricultural and wastewater projects."[8] The recently passed Inflation Reduction Act included several tax incentives to support RNG, including investment tax credits for cleaning and conditioning and related equipment. A recent study completed by ICF found potential available feedstocks to support significant RNG production growth well into the future.[9]

II. The Need for Revisions to the NAICS.

The Request for Information includes seven questions in the notice. We provide responses to the relevant questions below.

1. What information and what high priority concerns should the Working Group consider in making these recommendations for potential revisions to the NAICS and NAPCS that would enable characterization of the economic value of the U.S. bioeconomy?

The Working Group must acknowledge the growth of RNG as a result of federal and state policies that continue to support growth in the industry, as described above. We have heard from the U.S. Department of Agriculture of the need to develop a method to track

[5] EPA, *RINS Generated Transactions: Total Net Generation Report*, https://www.epa.gov/fuels-registration-reporting-and-compliance-help/rins-generated-transactions (data as of May 10, 2023). The RFS program requires a minimum amount of renewable fuel be part of the transportation fuel market in the United States each year. 42 U.S.C. §7545(o). Under the RFS program, RNG qualifies as an advanced biofuel, including cellulosic biofuel. This is represented in EPA's data through generation of a D5 (non-cellulosic advanced biofuel) or D3 (cellulosic biofuel) Renewable Identification Numbers, which represents production of renewable fuel under the program. A RIN represents an "ethanol-equivalent" gallon of fuel. For transportation fuel use, RNG is sold as compressed natural gas or liquified natural gas.

[6] *See, e.g.,* U.S. Department of Energy, *U.S. Department of Energy Clean Hydrogen Production Standard (CHPS) Guidance*, at 3 (June 2023), https://www.hydrogen.energy.gov/pdfs/clean-hydrogen-production-standard-guidance.pdf; 88 Fed. Reg. at 80,687, 80,692-80,693.

[7] *See* 85 Fed. Reg. 79,005 (Dec. 8, 2020) (discussing proposed revisions to EIA Survey Form 176).

[8] Bates White Economic Consulting, *Renewable Natural Gas Supply and Demand for Transportation*, at 3 (2019), *available at* https://www.bateswhite.com/media/publication/179_BW%20RNG%20Report.pdf.

[9] ICF, *Renewable Sources of Natural Gas: Supply and Emissions Reduction Assessment,* at 2 (2019), *available at* https://gasfoundation.org/wp-content/uploads/2019/12/AGF-2019-RNG-Study-Full-Report-FINAL-12-18-19.pdf.

digestors. We also believe, because of the differences between biogas and RNG, that RNG must be distinguished.

RNG also provides environmental and economic benefits, as an alternative means of addressing methane emissions from organic wastes. For example, RNG provides an alternative to flaring (and wasting) methane emissions at landfills, while also providing municipalities with an additional source of revenue by allowing RNG production to occur at their sites. RNG also presents a viable part of any local strategy for reducing GHG emissions.

EPA has also acknowledged the numerous benefits of agricultural digesters, including:

- Protecting animal and human health by reducing odor and pathogens from wastes;
- Converting nutrients in manure into a form that, when used as fertilizer, is more accessible for plants to use compared to raw manure, which provides agronomic benefits, including reducing erosion, increasing water retention, crop productivity and yield;[10]
- Recycling nutrients on the farm, creating an economically and environmentally sustainable food production system;
- Producing heat, electricity, or fuel using a renewable fuel that burns cleaner than combusting the biomass directly; and
- Accepting food waste from places like restaurants and grocery stores, reducing food waste sent to landfills.[11]

Capturing, cleaning, and conditioning biogas to RNG prevents methane or flaring emissions on site at the farm. Using RNG in natural gas, hydrogen, or electric vehicles in lieu of diesel fueled medium and heavy-duty vehicles produces lower NOx emissions and eliminates diesel particulates, the contaminant that is doing most harm to disadvantaged communities.[12] The cleaning of the biogas also removes pollutants that may have otherwise been emitted,

[10] Collection of wastes for use in digesters also helps prevent nitrates from leaching into groundwater and can reduce the impacts of runoff, improving local water resources. *See, e.g.,* Argonne National Laboratory, *Renewable Natural Gas (RNG) for Transportation: Frequently Asked Questions*, at 2 (2020), *available at* https://www.anl.gov/sites/www/files/2020-11/RNG_for_Transportation_FAQs.pdf ("For farm and livestock operations, anaerobic digestion can also reduce nitrogen and phosphorus runoff to groundwater and downstream waters.").

[11] *See* EPA, *The Benefits of Anaerobic Digestion*, https://www.epa.gov/agstar/benefits-anaerobic-digestion (last updated May 21, 2023).

[12] For example, the NOx emission standard for heavy-duty engines is 0.2 g/bhp-hr. and this level of performance is typical of contemporary medium and heavy-duty diesel engines. The Optional Low NOx emission standard of 0.02 g/bhp-hr. (a 90% reduction in emissions) is typical of contemporary medium and heavy-duty natural gas engines.

improving local air quality. In particular, dairy digesters help to reduce hydrogen sulfide emissions.[13]

Moreover, EPA has long recognized the benefits of farms utilizing digesters, including the economic benefits to farmers.[14] RNG promotes rural economic growth due to the technically trained workforce needed to run the digester at optimal conditions, and the market establishment for the diverse products.[15] As EPA has recognized, "Biogas systems offer a wide range of potential revenue streams, growing jobs and boosting economic development in the community. These systems can also improve rural infrastructure for waste management and distributed energy delivery improving community health, resiliency, and viability."[16] EPA has further stated:

> Biogas systems can support sustainable communities by reducing methane emissions, improving water quality, producing a local source of renewable heat, electricity and fuel, and strengthening the local economy by reducing energy costs and generating revenue. They can also play a vital role in helping communities adapt and become more resilient to the effects of climate change.[17]

RNG contributes substantially to the bioeconomy, and a high priority should be given to the RNG industry to help facilitate continued research and investments moving forward.

2. Which quantitative economic indicators and processes are currently used to measure the contributions of the U.S. bioeconomy? Are these indicators reasonably accurate measures of the product components, scope, and value, of the bioeconomy; and, please explain why?

EPA tracks production of renewable fuels that are produced under the RFS program through its EPA-Moderated Transaction System or EMTS. Based on a fuel's energy compared to

[13] California Bioenergy Presentation, *California Air Resources Board Workshop: Methane, Dairies and Livestock, and Renewable Natural Gas in California*, at slides 10-11, Mar. 29, 2022, *available at* https://ww2.arb.ca.gov/sites/default/files/2022-04/dairy-ws-session-6-CalBio.pdf.
[14] *See* EPA, *The Benefits of Anaerobic Digestion*, https://www.epa.gov/agstar/benefits-anaerobic-digestion (last updated May 21, 2023); *see also* EPA, *Anaerobic Digestion on Dairy Farms*, https://www.epa.gov/agstar/anaerobic-digestion-dairy-farms (last updated Oct. 27, 2022) ("Tax credits, renewable energy credits, carbon offset credits, or other incentives offered through federal or state renewable or low carbon fuel standards are a potential source of revenue or cost savings.").
[15] Dr. Juliana Vasco-Correa, et al., *Economic Implications of Anaerobic Digestion for Bioenergy Production and Waste Management*, The Ohio State University College of Food, Agricultural and Environmental Sciences, Ohio State University Online (2018), https://ohioline.osu.edu/factsheet/fabe-6611.
[16] EPA, USDA, Department of Energy (DOE), *Biogas Opportunities Roadmap*, at 12 (2014), *available at* https://www.epa.gov/sites/default/files/2015-12/documents/biogas-roadmap.pdf.
[17] *Id.* at 15.

ethanol, a Renewable Identification Number (RIN) is generated for each ethanol-equivalent gallon of fuel. Currently, renewable compressed natural gas and renewable liquified natural gas are tracked as "cellulosic biofuel" or "advanced biofuel." EPA has also proposed a tracking method for RNG used as renewable electricity and as a feedstock for other fuels, which will also be tracked through the EMTS. This data is aggregated and made publicly available at https://www.epa.gov/fuels-registration-reporting-and-compliance-help/rins-generated-transactions. Although there may be some renewable fuel not covered by the RFS program (e.g., awaiting an approved pathway by EPA), this largely tracks the contributions of renewable fuels to the transportation sector.

As noted above, EIA also recently added a specific request for information on RNG supply. This survey only recently began to collect information on RNG, and so we cannot take a position yet on accuracy, as our experience is that it can take a biofuels industry time to provide consistent responses to EIA surveys. We also believe the survey focuses more on geologic natural gas disposition, and so there may not be sufficient information reported on disposition of the RNG (compared to supply).

3. Which industries not currently measured as a unique classification in NAICS related to the bioeconomy should be considered? Similarly, which products not currently measured as a unique classification in NAPCS related to the bioeconomy should be considered? Please describe how a unique classification for such industry or product would meet the principles of NAICS and NAPCS. Please also include a description of the industry or product, with specific examples. Please also provide an explanation of how such industry or product would advance understanding of measuring the bioeconomy.

RNG Coalition requests that RNG production facilities be included as a distinct industry. Among the four principles that guide NAICS development, which are noted in the Federal Register notice, is that NAICS gives special attention to developing production-oriented classifications for new and emerging industries and industries engaged in the production of advanced technologies. As discussed above, RNG is growing and will continue to do so into the future.

The NAICS is a system for classifying establishments (individual business locations) by type of economic activity. It is widely used to identify businesses by government agencies as well as private entities. For example, many economic models use NAICS codes to show who receives/loses value due to policy interventions. Unfortunately, industry-specific NAICS codes do not exist for our robust RNG industry, or that clearly represent our industry's RNG production, making it difficult both to report uniformly and to identify appropriate NAICS codes that accurately reflect our industry's business activity. RNG Coalition requests revisions to create new RNG industry NAICS codes, allowing for more consistent and accurate measurement of this valuable and growing aspect of the U.S. clean energy economy.

RNG Coalition acknowledges that the ECPC previously declined to recommend an industry for biogas generation as part of the 2017 updates to the NAICS code. While recognizing the potential for continued growth of biogas production from anaerobic digesters, the ECPC found that "biogas output at many installations is not the primary activity of the business unit." It further noted that: "When biomass is used as a primary fuel source in the market production of electric power, the activity is classified in NAICS 221117, Biomass Electric Power Generation. This industry was created in NAICS 2012 to identify that primary activity."[18] This may be true of the biogas sector, specifically, to the extent biogas production facilities have not ceased electric power generation today due to market transformations. However, there is a clear distinction between the biogas sector and the RNG industry.

In particular, while RNG production facilities may be co-located at or near landfills, wastewater treatment plant, organic food waste or agricultural digesters where biomass was previously used to generate renewable electric power, RNG production facilities are developed for the express purpose of capturing and converting methane, or cleaning and conditioning existing biogas, for sustainable end-use applications by residential, commercial, and industrial consumers of natural gas. Because RNG is interchangeable with geologic natural gas, a significant portion of our industry's RNG production is interconnected with, injected into, and distributed nationwide to end-use customers via natural gas utility common carrier pipelines. RNG production facilities are most often owned or operated by separate entities whose business and operations are distinct and easily distinguishable from the feedstock source itself. RNG industry developers generally secure biogas rights from the organic waste feedstock owner (landfill, wastewater treatment plant, food waste facility, livestock or agricultural operation, etc.). RNG project developers often share revenue from the sale of RNG or monetization of associated environmental credits with the feedstock owner in the form of a royalty, but the RNG project developer separately raises the necessary capital and is responsible for overseeing or subcontracting all of the engineering, design, construction, operations and maintenance of the RNG production facility (a completely separate business from operating a landfill, wastewater treatment facility, livestock or agricultural operation, dairy, etc.).

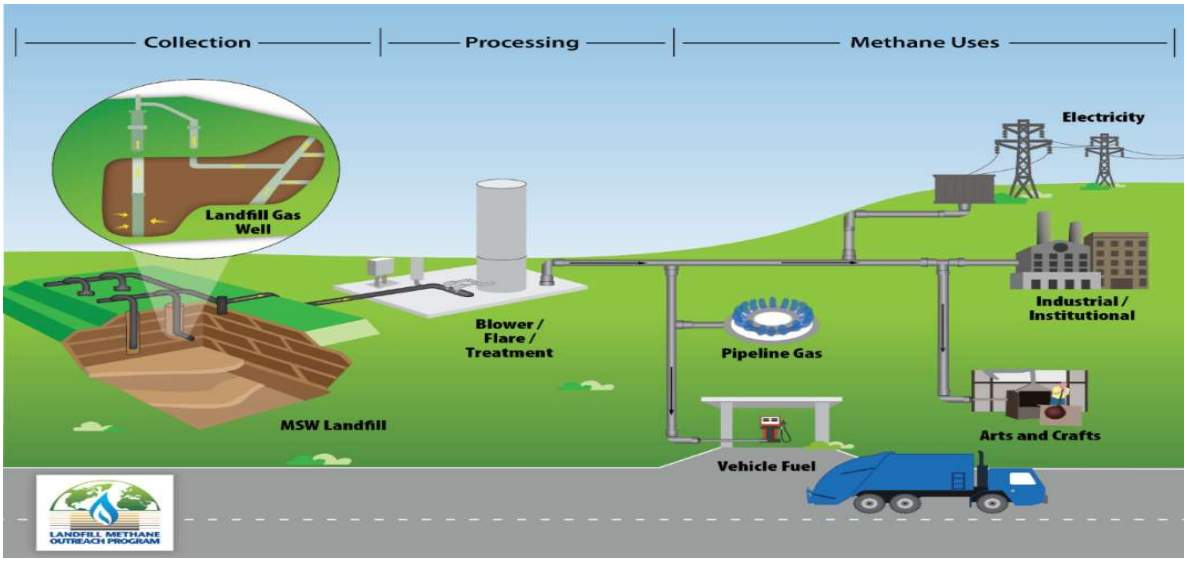
In 2011, nearly 100% of all RNG produced was used to generate renewable electric power—all this in addition to the biogas projects captured under NAICS code 221117. More recently, our industry members have been unsure whether to use NAICS code 221117, because of the stark difference between biogas (naturally occurring as organic materials decompose) and RNG (a product gas that costs millions of dollars to produce from biogas)—and such classification can be problematic because biogas is prohibited from pipeline injection and cannot be used in vehicles as a transportation fuel. Utilities require that biogas be conditioned and upgraded to RNG, so that it meets specific pipeline specifications as a prerequisite for being

[18] NAICS, *ECPC Responses on Public Comments Regarding Changes for 2017,* at Docket 17-0065.

injected into and transported intra- and interstate via natural gas utility common carrier pipelines. Now, more than 80% of all RNG produced today is delivered to federal and state transportation fuel markets. Additionally, there is increasing demand for RNG use as a source of renewable heat. Consequently, the current NAICS code 221117 previously identified by the ECPC that is limited to power generation from biomass is not a sufficient code for the RNG industry and is not applicable to many of our industry's RNG projects.

In response to comments for the 2022 update, ECPC stated that, "[g]iven related inquiries into classification of biogas and biofuel production, the ECPC recommends the addition of two index items: 'Biogases, industrial (i.e., compressed, liquefied, solid), manufacturing' for NAICS 325120, Industrial Gas Manufacturing; and 'Biofuels not made in petroleum refineries and not blended with petroleum' for NAICS 325199, All Other Basic Organic Chemical Manufacturing," proposing "no further changes."[19] It is not clear if these proposed changes are sufficient to distinguish the different aspects of feedstock collection, cleaning and conditioning of biogas to RNG, and facilities downstream that convert that RNG to a transportation fuel.

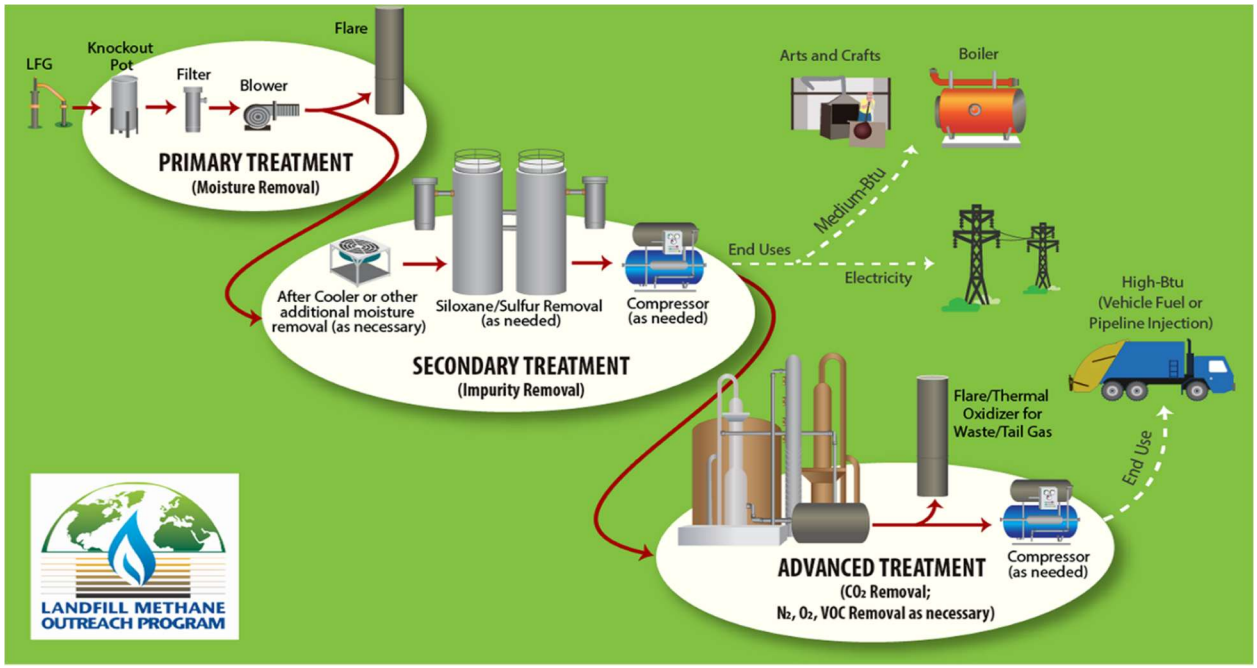
The technology and production process for RNG are similar but may have some differences based on the source of biogas. As noted above, RNG facilities collect biogas and treat it to remove trace constituents and upgrade it to pipeline quality specifications, as illustrated in the following diagram.



Source: EPA, Landfill Methane Outreach Program (LMOP): Basic Information About Landfill Gas, https://www.epa.gov/lmop/basic-information-about-landfill-gas (last updated Apr. 21, 2023).

[19] ECPC Responses to Public Comments, at 12, *available at* https://www.census.gov/naics/federal_register_notices/responses_2022/ECPC%20Responses%20to%20Public%20Comments.pdf.

The technologies used to produce RNG include anaerobic digesters (which is the most common type of technology used currently), thermal gasification systems, and power-to-gas (P2G) in combination with a methanation system.[20] Although RNG can also be used for electricity and other uses, the following diagram illustrates the additional treatment that is undertaken to produce RNG—a high-BTU gas that is pipeline quality—compared to biogas from a landfill.



Source: EPA, Landfill Methane Outreach Program (LMOP): Basic Information About Landfill Gas, https://www.epa.gov/lmop/basic-information-about-landfill-gas (last updated Apr. 21, 2023).

For the types of treatment that may be used to upgrade the biogas, see ICF, *Renewable Sources of Natural Gas: Supply and Emissions Reduction Assessment,* at 16 (2019), *available at* https://gasfoundation.org/wp-content/uploads/2019/12/AGF-2019-RNG-Study-Full-Report-FINAL-12-18-19.pdf.

The main components of anaerobic digestion of animal wastes include manure collection, the digester, effluent storage (e.g., a tank or lagoon), and gas handling equipment.[21] "Processing of the influent to a large water resource recovery facility (WRRF) is comprised typically of four stages: pre-treatment, primary, secondary, and tertiary treatments. These stages consist of mechanical, biological, and sometimes chemical processing."[22] Despite these differences, these facilities undertake similar activities. We believe there should either be one

[20] ICF, *Renewable Sources of Natural Gas: Supply and Emissions Reduction Assessment,* at 6 (2019), *available at* https://gasfoundation.org/wp-content/uploads/2019/12/AGF-2019-RNG-Study-Full-Report-FINAL-12-18-19.pdf.
[21] *Id.* at 20.
[22] *Id.* at 23.

new NAICS industry code for all RNG production facilities, regardless of the feedstock and regardless of the specific technology deployed, or separate codes could be created that identify the particular feedstock (landfill, wastewater, food waste, livestock, or agricultural waste, etc.) and specific technology (anaerobic digestion, gasification, non-combustion thermal conversion, Power-to-Gas, etc.).

4. How might potential changes to the NAICS impact existing industry measurements, such as assessing changes in the economic output across current industries, time series measures, or data accuracy?

We believe that a separate NAICS code will assist in better tracking RNG facilities. We are aware that confusion over the proper NAICS code has affected certain financing efforts. We also are aware that the U.S. Department of Agriculture is looking at better ways to track and identify biogas and RNG facilities to assist in their grant and research programs. While RNG Coalition maintains a list of RNG facilities, it will also assist in ensuring consistent reporting of facilities and RNG uses. Further, as RNG uses expand, it will better assist agencies in tracking production, such as EPA in ensuring compliance with the RFS program's regulations. Providing clear NAICS codes may assist agencies in identifying the appropriate entity, particularly due to co-location and separate ownership of the source of biogas and the cleaning and conditioning equipment.

5. What role can the NAPCS fill in order to advance measurement of biomanufacturing and biotechnology?

RNG Coalition has no specific comments on the NAPCS.

6. Biobased processes and products that are embedded in traditional industries pose challenges for differentiation and measurement. Are there methodologies that can differentiate these bioeconomy processes from current manufacturing processes to enable measurement? If yes, please explain.

RNG Coalition has no specific comments in response to this question.

7. What potential bioeconomy measurement strategies might be considered other than revisions to and inclusion in the NAICS or NAPCS? For example, are there ways the Federal Government could better collect information to provide better measurement on biobased processes or products in current industries?

The RNG industry has had discussions with EIA on reporting RNG supply and disposition that we believe would be helpful to further develop.

III. Conclusion

On behalf of the RNG industry in North America, we appreciate the opportunity to submit these comments. RNG Coalition respectfully requests that the Working Group recommend that the RNG industry be considered as part of the 2027 updates to the NAICS. The disconnect between the current NAICS code and RNG facilities has increasingly become an issue for the RNG industry, and we believe the proposed modifications are well warranted.

In conclusion, thank you in advance for your consideration of our request to create new and specific NAICS codes for the RNG industry that more accurately reflect our industry's RNG production, allowing for more consistent and accurate measurement of this valuable and growing aspect of the U.S. economy. Please contact us directly if you have any questions.

Sincerely,
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