U.S. GRAINS COUNCIL

Growth Energy™
Expanding America's Bioeconomy

RFA
RENEWABLE FUELS ASSOCIATION

March 18, 2025

The Honorable Sean Duffy
United States Department of Transportation
1200 New Jersey Ave SE
Washington, D.C. 20590

Dear U.S. Transportation Secretary Duffy,

Congratulations on your appointment as Secretary for the U.S. Department of Transportation under the Trump Administration. We look forward to supporting your work to provide efficient, productive transportation systems in the United States that promote increased opportunities for our hard-working citizens.

As you know, U.S. agriculture and U.S. biofuels hold tremendous opportunity to support emerging markets within the aviation sector both in the United States and globally, which serves to create jobs, expand opportunities for rural communities and increase economical options for the American people. Additionally, as U.S. ethanol has a trade surplus, supporting emerging growth sectors such as Sustainable Aviation Fuel (SAF) will further cement support for rural America at a time when global competition has the potential to undermine our progress in this area. We stand ready to collaborate with you and your staff to ensure actions taken by the United States within the International Civil Aviation Organization (ICAO) are predicated on science, accurately reflect U.S. industry and allow us to compete fairly and prioritize U.S. producers. In addition to domestic policies, efforts undertaken in ICAO will have a significant impact on future demand and trade of U.S. biofuels around the world.

The path forward for lower carbon aviation fuels requires a new and unique confluence of aviation manufacturers and operators with the biofuels industry. The United States can be a global leader to integrate these different sectors and meet ICAO's ambitious obligations under CORSIA. Unfortunately, the United States has not been adequately represented in ICAO's technical process and this is undermining the competitiveness of the U.S. biofuels industry as well as the scientific integrity of CORSIA. We therefore urge you to incorporate broader representation from the U.S. biofuels industry through the United States expert nominations to ICAO. This would ensure policies obligating the United States are transparent and allow for all affected industries to provide input on policy formation and scientific accuracy.

Due to the lack of transparency around ICAO's process, we are uncertain about specific proposals being considered. However, we understand that some potential proposals would improve the indirect land use change (ILUC) score for multi-cropped commodities without similarly providing ILUC reductions to global or regional values of that same commodity. Additionally, we are concerned that ILUC reductions may not be accurately reflected in all commodities that are part of a multi-cropped system.

Specifically, we believe that lowering the ILUC value for Brazil's multi-cropped corn ethanol, while refusing to simultaneously lower the ILUC value on U.S. corn ethanol - which is predicated on both ILUC and direct land use changes in Brazil - further penalizes an American industry. Support for this proposal by the United States, without a mutually beneficial reduction for U.S. corn ethanol would be counter to the principles of scientific integrity.

We also stress the need to revise the current process utilized for determining ILUC values as soon as possible given the lengthy three-year cycle required to review and update CORSIA's values. As ICAO begins a new policy cycle in 2025, we hope the United States will push for revisions on how ILUC values are determined and applied to CORSIA eligible fuels.

Including the biofuels industry within the U.S. delegation would allow for greater understanding of proposals affecting and referencing our industry; this also accomplishes the goals outlined in President Trump's Executive Orders (EOs) from January 20, 2025. Specific references include Section 2 of "Putting America First in International Environmental Agreements", which notes putting U.S. interests and the American people "first in development and negotiations of international agreements that have the potential to damage or stifle the American economy" and that they must not "unduly or unfairly burden the United States". Efforts that would result in improved Brazilian ILUC scoring, while simultaneously omitting similar improvements to U.S. scoring would jeopardize the export potential of U.S. corn ethanol and could erode the U.S. trade surplus in ethanol, countering the EO on "America First Trade Policy".

The EO "Unleashing American Energy" also discusses the need to "guarantee that all executive departments and agencies provide opportunity for public comment" as well as calling on agencies to review regulations, policies, and actions that impose an "undue burden on the identification, development, or use of domestic energy resources", including a specific reference to biofuels.

As noted in our enclosed January 26, 2024 letter we stand ready to work with you to ensure direct insights in regard to the actions and updates of the ICAO CORSIA model. This will enable U.S. biofuels to have parity with other production countries and maintain the United States as a competitive supplier of biofuels under an updated and scientifically accurate ICAO CORSIA structure. We welcome an opportunity to discuss this further.

X	X	X Geoff Cooper
Ryan LeGrand U.S. Grains Council	Emily Skor Growth Energy	Geoff Cooper Renewable Fuels Association