



The Honorable Janet L. Yellen  
Secretary U.S. Department of the Treasury  
1500 Pennsylvania Ave, NW  
Washington, DC 20220

September 14, 2023

Dear Secretary Yellen:

On behalf of U.S. bioethanol producers, we applaud and support global efforts to increase the use of sustainable aviation fuel (SAF) to decarbonize the aviation sector. However, the emerging global SAF industry is at a critical juncture, and pending decisions on carbon intensity estimation methods will ultimately determine the success or failure of SAF commercialization and trade efforts. Specifically, the International Civil Aviation Organization's (ICAO) CORSIA methodology includes outdated information and obsolete data on the carbon intensity of corn ethanol-based SAF. To ensure U.S. farmers, ethanol producers and SAF developers have a fair opportunity to participate in the global market, we firmly believe that timely and needed updates to the ICAO CORSIA model are required for export opportunities, and that recognition of the Department of Energy's (DOE) GREET methodology must be used for the purposes of estimating the carbon intensity of SAF domestically.

While U.S. domestic initiatives are essential in encouraging SAF production and utilization, we must not disregard the global market's influence on curating SAF supply and demand and the U.S. bioethanol industry's competitiveness on the international stage. Under the current ICAO CORSIA methodology, U.S. corn ethanol SAF appears uncompetitive on the world market compared to SAF produced from alternative sources in other regions, due to ICAO's use of outdated data from over a decade ago such as their excessive indirect land use change (iLUC) penalties.

We strongly support the adoption of the DOE's GREET model by the U.S. Treasury as the standard for carbon intensity scoring of conventional aviation fuels and SAF. The latest DOE GREET model relies on the most current information and highest-resolution data regarding the energy use, carbon emissions and potential land use impacts associated with the corn ethanol-based SAF process. By incorporating the DOE GREET model into its evaluation framework, the Treasury can unlock the full potential of agriculture to meet the growing demands of the global aviation industry while simultaneously reducing its carbon footprint.

Furthermore, we strongly urge the U.S. Treasury and interagency officials to collaborate closely with the ICAO to rectify the discrepancies in its CORSIA model. We believe the U.S. should communicate with ICAO to undertake the

necessary adjustments to its methodology and ensure timely scientific updates. These efforts are essential to create a level playing field for U.S. SAF producers, allowing them to effectively compete in supplying the rapidly expanding global SAF market.

The economic and environmental benefits of U.S. SAF cannot be overstated. Corn ethanol-based SAF holds the potential to contribute substantively to both decarbonization and economic growth in the U.S. aviation sector, and President Biden's recent statement that farmers will provide 95 percent of all SAF in the next two decades underscores the significant role agriculture will play in the sector's transformation.

We sincerely appreciate your engagement and support in ensuring U.S. corn ethanol-based SAF can participate and compete in the growing global marketplace. By recognizing the current DOE GREET model as the most scientifically robust, most transparent, and most current carbon scoring mechanism, and ensuring a fair scoring mechanism under ICAO's CORSIA, we can fully appreciate the contributions of the American bioethanol industry, enhance agricultural exports, and lead the way in global aviation sustainability.

Sincerely,

Geoff Cooper  
Renewable Fuels Association

Emily Skor  
Growth Energy

Ryan LeGrand  
U.S. Grains Council



CC: Secretary Tom Vilsack, U.S. Department of Agriculture (USDA)  
Administrator Michael Regan, U.S. Environmental Protection Agency  
U.S. Trade Representative, Katherine Tai  
Secretary Jennifer Granholm, U.S. Department of Energy  
Secretary Peter Buttigieg, U.S. Department of Transportation  
Under Secretary Alexis Taylor, Trade and Foreign Agricultural Affairs, USDA