
August 27, 2025

Public Comments Team

Agency for Natural Resources and Energy

Natural Resources and Fuel Department, Petroleum Refining and Reserve Division

1-3-1 Kasumigaseki, Chiyoda-ku

Tokyo 100-8901, Japan

Subject: Comments from the U.S. Ethanol Industry on Japan's Proposed Update to the Gasoline Carbon-Intensity Baseline and Reduction Target

To the Public Comments Team,

We appreciate the opportunity to comment on the proposed updates to the gasoline carbon-intensity (CI) baseline (to **90.17 gCO₂e/MJ**) and the increase in the reduction target to **60 percent**. We view these as useful technical calibrations that provide clearer compliance signals while maintaining Japan's overall policy direction. Given this change will alter the U.S. market share potential for Japan's on-road fuel use, we ask Japan to initiate a revision of the U.S. corn ethanol CI score to restore the ability for U.S. ethanol to have full market access potential.

Fuel ethanol from the United States can contribute to measurable reductions in the carbon intensity of finished gasoline with predictable, scalable supply. Producers have reduced process energy needs through heat integration and combined heat and power, increased the share of lower-carbon electricity and fuels, optimized logistics, and adopted improved on-farm practices such as enhanced nitrogen management, reduced tillage, and cover crops. These improvements are supported by plant-level data and established measurement, reporting, and verification (MRV) systems suitable for robust lifecycle modeling.

We also note ongoing methodological advances under Argonne National Laboratory's Greenhouse gases, Regulated Emissions, and Energy use in Technologies (GREET) model. This includes more granular treatment of farming inputs and yields, updated nitrous-oxide and energy factors, improved representation of transport and co-products, and clearer pathways for facility-level decarbonization (including carbon capture where applicable). As such refinements are reflected in policy lifecycle assessments (LCA), United States corn-ethanol pathways become more competitive on a carbon basis and more representative of actual performance.

We support Japan's continued reliance on science-based, technology- and feedstock-neutral lifecycle assessment applied consistently across pathways, as this approach provides compliance certainty, rewards real emissions reductions, and ensures a level playing field for all low-CI options, including fuel ethanol from the United States.

We appreciate your consideration of these comments.

Sincerely,



Ryan LeGrand
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Emily Skor
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