Growth Energy™
Expanding America's Bioeconomy

October 30, 2025

Mr. Edward Marcus
Chair of the Trade Policy Staff Committee
Office of the U.S. Trade Representative
600 17th Street NW
Washington, DC 20508
Docket ID: USTR-2025-17782

Dear Mr. Marcus:

Thank you for the opportunity to comment on significant foreign trade barriers for the 2026 National Trade Estimate report.

We appreciate the support and assistance of the U.S. Trade Representative (USTR) on these important and often longstanding issues as well as the agency's continued engagement with foreign governments to expand market access for U.S. ethanol. Growth Energy is the nation's largest association of ethanol producers, representing 97 U.S. plants that each year produce 9.5 billion gallons of low-carbon, renewable fuel; 129 businesses associated with the production process; and tens of thousands of ethanol supporters around the country. Growth Energy represents the leading exporters in the ethanol industry, helping to support nearly two billion gallons of ethanol exports to over 60 countries around the world.

Expanding market access for U.S. ethanol is very different than other agricultural commodities and requires different levels of support that accompany changing a country's energy supply chains and fuel specifications. These positive, mutually beneficial exchanges with countries have already led to significant policy advancements, including with Japan and the United Kingdom. We request a continuation of those supportive efforts in collaboration with industry both bilaterally, regionally, and as a part of U.S. government engagement in international bodies (such as the G7, G20, International Maritime Organization, and International Civil Aviation Organization). USTR's continued assistance will help to expand U.S. ethanol's significant 2024 trade surplus of 1.79 billion gallons, or $3.97 billion.

Brazil
In 2024, the U.S. had a $150 million ethanol trade deficit with Brazil—in 2023 that deficit was $212 million. This was in stark contrast with a $197 million U.S. ethanol trade surplus with Brazil in 2018. This recent ethanol trade deficit with Brazil tracks with Brazil's movement away from reciprocal, tariff-free ethanol trade between our two countries. Furthermore, Brazil was once the top export market for U.S. ethanol, valued at $736 million in 2017, but has fallen significantly. While Brazil may have inched back to the 13th largest export market in 2024 ($54 million), it was the 41st largest market in 2023 ($140,000).

The Brazilian market has been the epitome of unfairness for U.S. ethanol. While we have continued to push Brazil to remove its unfair tariff and to address other issues limiting U.S. ethanol exports, they have been unwilling to do so. A reciprocal tariff on Brazil would help to

address grossly inequitable tariffs/trade, unfairness in U.S. ethanol's lack of eligibility under Brazil's low carbon fuel policy, and Brazilian efforts to supersede U.S. leadership in biofuels and as a supplier of choice.

We applaud USTR's initiation of a Section 301 investigation into Brazil's unfair trade action and hope our earlier provided comments and testimony on this will help guide USTR in the next steps of its investigation.

U.S. Tariffs Compared to Brazil
The U.S. levies 1.9 percent and 2.5 percent tariffs for denatured and undenatured non-beverage ethanol, respectively. Today, Brazil's applied tariff for imports of ethanol from non-Mercosur countries is 18 percent, but this was not always the case.

Prior to 2012, Brazil lobbied the United States to remove its "other duty or charge" on ethanol imports, with Brazilian industry calling for "free and fair trade" between the two largest ethanol producing and consuming counties. Brazil sought to improve its access to the U.S. ethanol market given the expanding volumetric requirements under the U.S. Renewable Fuels Standard (RFS). However, as U.S. ethanol exports to Brazil expanded into 2017, Brazil went backward on the desire for free and fair trade by establishing a tariff rate quote (TRQ). When the original TRQ was expiring in 2019, Brazil increased the TRQ but added quarterly allocations. These allocations limited exports given the seasonal nature of ethanol production in Brazil. Once that TRQ expired in December 2020, U.S. ethanol exports to Brazil were assessed a 20 percent tariff. The tariff fluctuated until it settled at the current 18 percent tariff in February 2023.

Brazil's Low Carbon Fuel Policy (RenovaBio)
Brazil only recently decided to certify one U.S. ethanol producer under RenovaBio, the country's low carbon fuel policy. However, because of the issues surrounding the structure of RenovaBio's compliance verification, only a very small portion of that biorefinery's production is deemed eligible to participate. Brazil is seeking to apply this same methodology for all U.S. ethanol producers, despite this extremely limited eligible. By comparison, RenovaBio certifies most, if not all, of the output of Brazilian ethanol producers, allowing them to benefit from the program. This further disadvantages U.S. ethanol while Brazil continues to peddle a misleading narrative that falsely suggests any American producer can fairly participate in the program or that it allows sustainably produced ethanol to be eligible.

RenovaBio also disadvantages U.S. corn ethanol by assigning it an unnecessarily punitive carbon intensity score for the using default values. Given RenovaBio was established to meet the needs of Brazil's sugarcane growers and it was structured around that supply chain, Brazil's producers do not receive a similarly punitive default score as they do not need to rely on default values.

RenovaBio is a lucrative program for Brazilian biofuel producers and is modeled on the U.S. RFS and California's Low Carbon Fuel Standard (LCFS). In the U.S., Brazilian producers are able to participate in both the RFS and the LCFS and can reap the financial benefits of those programs. Brazilian sugarcane ethanol is eligible to create advanced Renewable Identification Numbers (RINs) under the RFS as well as carbon credits under California's LCFS. Conversely, U.S. ethanol cannot participate in RenovaBio and is not eligible to generate similarly lucrative

carbon credits (known as CBios) under RenovaBio. In 2023 (the last full year of data available from the U.S. Department of Agriculture's (USDA's) Foreign Agricultural Service), Brazilian fuel distributors met 81 percent of RenovaBio's reduction targets by retiring 33.1 million CBios. CBio trading results in an estimated average price of $16.61 per CBio, resulting in a total of $548 million in lost opportunity for U.S. ethanol producers under RenovaBio. Over time, the amount of CBios are projected to increase incrementally, ultimately reaching nearly 96 million CBios annually by 2031. Brazil hopes the CBios will reach values like California's LCFS.

Third-Party Markets
Brazilian ethanol exports entering the United States via the Gulf are typically destined to be processed into ethyl tert-butyl ether (ETBE) for export, including to Japan. While U.S. ethanol can be used to meet up to 100 percent Japan's on-road demand for ethanol and ETBE, it is estimated that 40 percent of U.S. ETBE exports to Japan, or 85 million gallons (with an estimated value of $153 million) are produced from Brazilian ethanol. A reciprocal tariff or Section 301 remedies on Brazilian ethanol could result in higher costs for ETBE produced from Brazilian ethanol and not U.S. ethanol. Improved economics of U.S. ethanol vis-à-vis Brazilian could allow for a greater proportion of ETBE exported to Japan to come from U.S. ethanol.

Brazil continues to seek preferential recognition for its multi-cropped corn as being more sustainable and a better alternative to U.S. corn. Not only do we disagree with this assessment but as Brazil continues to push this false narrative, we have become increasingly concerned that Brazil is affecting our potential to compete in certain markets, like Japan, that put a premium on lifecycle emissions reductions. Assistance by the U.S. government would be welcome to reset the discussion on sustainable corn production in the United States.

Canada
Canada has been our largest and most reliable export market, setting record volumes of 675 million gallons in 2024, valued at $1.5 billion. This represents approximately 35 percent of all U.S. ethanol exports. Increases in provincial blending mandates have helped U.S. ethanol exports grow to meet these higher mandates and represent continued growth potential. However, we are concerned with "domestic content" requirements that have been announced at the provincial level and proposed federally.

On August 8, Ontario's Ministry of Environment, Conservation, and Parks adopted a domestic content requirement for its gasoline, which was effective immediately. Ontario currently requires a renewable content requirement of 11 percent in its gasoline (i.e., E11), which is set to increase to E13 in 2028 and E15 in 2030. Of that renewable gasoline requirement, 27 percent of that will need to have been produced in Canada for the remainder of 2025. For 2026 and 2027, that percentage will increase to 64 percent; for 2028 and 2029 it will decrease to 54 percent and then further decrease to 47 percent in 2030. The release notes that this requirement is aimed at being time-limited and temporary in nature. However, no additional details were provided other than that the ministry will continue to monitor factors impacting its producers. Ontario accounts for approximately 37 percent of Canada's gasoline sales.

In February 2025, British Colombia's (BC's) Minister of Energy and Climate Solutions issued Ministerial Order No. M41. This order notes that effective January 1, 2026, the minimum five

percent renewable fuel requirement for gasoline must be met with eligible renewable fuels (i.e., ethanol) produced in Canada. BC's low carbon fuel policy provides economic incentives for ethanol producers who have made significant financial investments to lower their carbon intensity level. This market, estimated to be 64 million gallons and valued at $115 million, will be unfairly closed to U.S. ethanol, and could result in the loss of financial investments by U.S. ethanol facilities who updated facilities to better perform in BC's low carbon fuel policy.

Given the size and importance of the Canadian market for U.S. ethanol, and the inclusion of ethanol on the second proposed list of commodities targeted by Canada for tariff retaliation, we ask that any trade dispute be resolved as soon as possible so U.S. ethanol can enter Canada tariff-free and without provincial origin restrictions. Additionally, we are concerned about the economic situation for inputs that are necessary for the U.S. ethanol production process, such as yeasts. Some yeasts are produced in Canada and imported into the United States. An import tariff on these products could undermine the price competitiveness of ethanol in the United States, affecting U.S. consumers.

We are concerned that continued efforts to limit imports and utilization of U.S. ethanol could result in market loss for U.S. ethanol and a loss of investments geared toward complying with provincial low carbon fuel policies. Changes to Canada's Clean Fuel Regulation may compound these issues by making it more difficult for U.S. ethanol to comply and participate.

China

In January 2020, China committed to substantial purchases under the Phase One trade agreement, including for agricultural commodities with a reference to ethanol. These commitments have not been fulfilled. While ethanol is just one of many agricultural commodities under the Phase One agreement, China agreed to $32 billion in additional purchases and agreed to strive for a further $5 billion in additional imports per year of agricultural products. In 2017, which serves as the baseline to determine purchases, U.S. ethanol exports to China were valued at $83 million. In 2020, U.S. ethanol exports were valued at $51 million and $162 million. Since then, no meaningful volumes have been exported. While tariffs are levied, endorsement by the government is necessary for purchases and seems to be the main reason for the lack of U.S. ethanol exports.

Colombia

On February 24, 2024, Colombia returned to its E10 mandate after almost three years of instituting lower and fluctuating blend levels that caused U.S. ethanol exports to Colombia to plummet. With this new market certainty, Colombia returned as the fifth-largest export market for U.S. ethanol in 2024, valued at $377 million. Despite its return as a significant ethanol export market, U.S. ethanol continues to face unfair trade practices despite the free trade agreement between the United States and Colombia. Since May 2020, Colombia has levied a countervailing duty (CVD) of $0.06646 per kilogram (or $0.20 per gallon) on imports of U.S. ethanol. During the March 2023 expiry review, Colombia determined it would extend its CVD for an additional five years at the same rate, but with an option to review after three years.

The process for the expiry review occurred during these blend rate fluctuations, which Colombia noted were due to limited domestic supply and high import prices. However, the CVD results in

higher import prices of U.S. ethanol and its removal would have negated the need for continued blend fluctuations by stabilizing both prices and imported supply. Additionally, while Colombia did experience a drop in their domestic production, the country's geographical limitations mean that imports and domestic ethanol supply different regions, meaning a nationwide fluctuation was not necessary to address domestic supply concerns, since they only affected a fraction of Colombian jurisdictions. While this is no longer an issue given the return to E10 blending, it is illustrative of the protectionist mentality on ethanol that is governing Colombia's decisions on the CVD.

Colombia continues to seek alternative options to its pricing formula for its domestically produced ethanol, as well as additional means to restrict ethanol. Both proposals have the potential to reduce U.S. ethanol exports and create policy uncertainty for Colombia's ethanol program. Colombia initiated a public comment period on October 1, 2025, for revisions to pricing[1] and a comment period on July 22, 2025, for potential restrictions on imports depending on Colombian production.[2] USTR's continued engagement to ensure fair and equal treatment in this market is critical to continue strong U.S. ethanol exports to Colombia.

European Union (EU)
The EU imposes an import duty on U.S. ethanol of 19.2 EUR/hl and 10.2 EUR/hl (for undenatured and denatured, respectively). In 2024, the EU was the fourth-largest export market for U.S. ethanol with exports amounting to nearly 197 million gallons valued at $428 million. Removing the EU's import duty could help expand U.S. ethanol exports to the bloc, generally, and make U.S. ethanol competitive with Brazil in the EU.

Currently, Brazilian ethanol is assessed the same import duty as the United States. However, that could change if the pending EU/Mercosur trade agreement is approved following the December 2024 final negotiations. The agreement would phase in a TRQ that would give Brazilian ethanol access to the EU market at a significantly reduced rate compared to U.S. ethanol, culminating with up to almost 218 million gallons being assessed a 6.4 EUR/hl for undenatured ethanol and a rate of 3.4 EUR/hl for denatured. Of that amount, up to almost 151 million gallons for specific chemical uses can enter without any duty assessed. This will further hurt U.S. ethanol exports to the EU as Brazil will be given a significant economic advantage.

The EU also uses "crop caps" that significantly restrict the amount of U.S. corn ethanol that can contribute to the EU's on-road emissions reductions targets under its 2024 revisions to its Renewable Energy Directive (RED). Revisions to RED were a part of the EU's "Fit for 55" package of proposals to implement the European Green Deal, which aims to reduce emissions by at least 55 percent by 2030 and reach climate neutrality by 2050.

The "Fit for 55" package also included new policies that set emissions reductions standards for aviation and marine fuels, called ReFuelEU Aviation and ReFuelEU Marine. Unlike for on-road applications, crop-based biofuels (such as U.S. corn ethanol) are prohibited from meeting the

[1] https://www.minenergia.gov.co/es/servicio-al-ciudadano/foros/establecer-metodologia-para-calculo-del-valor-ingreso-productor-alcohol-carburante-etanol/
[2] https://www.minenergia.gov.co/es/servicio-al-ciudadano/foros/establecer-un-mecanismo-para-medir-el-deficit-en-la-oferta-nacional-de-alcohol-carburante-para-garantizar-el-abastecimiento-interno/

emissions reductions targets for both aviation and marine end uses. Both the U.S. and European biofuels industries sought to rectify this injustice through the European courts, but these suits were dismissed on February 25, 2025.

The European Union bioenergy policies and regulations support inaccurate and outdated viewpoints that agriculture-based biofuels threaten global food security and cannot be sustainably produced. As a result, U.S. ethanol is severely restricted.

India

India has become a significant global producer of ethanol, largely to meet their E20 blend goal by 2025. India has also become a significant export market for U.S. ethanol. In 2024, India was the third-largest export market for U.S. ethanol, amounting to nearly 187 million gallons valued at $441 million. Despite the strength of this market, India prohibits the importation of ethanol for fuel uses, so all U.S. ethanol exports to India were for industrial purposes. This restriction is based solely on India's protectionist policy to support their domestic industry. As India seeks to establish itself as a global leader in biofuels, restricting access to their market sets a dangerous precedent to other countries seeking to establish a biofuels program. We have recognized India's interest to grow their biofuels industry and how doing so can be economically precarious. We supported past efforts to work around the full opening of the market. However, India has repeatedly denied these motives and reinforced their interest to only put up barriers to entry and unfairly close off competition.

Even if India can meet its ambitious E20 goal by relying only on domestic production, this restriction undermines market access for U.S. ethanol for fuel purposes and underpins an unfairtrade environment and practice by hindering fair competition.

Indonesia

Ethanol imports are assessed a 30-percent tariff rate by Indonesia, which is economically uncompetitive for the market compared to other octane enhancers (which can face zero or five-percent tariffs). To avoid this tariff, Indonesia is importing gasoline pre-blended with ethanol that can enter the country duty-free and often comes from Singapore. While imports of pre-blended gasoline seem to be growing, it is difficult to measure. Indonesia is poised to begin significant ethanol blending, with five-percent blending scheduled to start in 2025 for non-subsidized gasoline, and 10-percent blending starting in 2029. Despite being a leading user of biodiesel, ethanol blending has lagged due to limited domestic feedstocks. While there may be some effort to prioritize domestic production, this shouldn't be considered a barrier at this time, given the potential flexibility for imports. If Indonesia implemented a nationwide E10 mandate, removed the tariff, and removed other barriers to utilizing imported ethanol, it could result in a potential export market of over 900 million gallons.

Japan

USTR has been a good partner for the U.S. ethanol industry when it comes to encouraging Japan to expand their use of U.S. ethanol for both on-road and other applications. Because of this engagement, U.S. ethanol had been able to meet 100 percent of Japan's on-road ethanol demand, which is primarily met through ETBE (a fuel additive produced with ethanol). While Japan recently proposed increasing the greenhouse gas (GHG) emissions value of gasoline, this

increase will also correspond with increasing the emissions reduction target from 55 percent to 60 percent. This increased threshold would lower the maximum market share for U.S. ethanol from 100 percent to approximately 90 percent. As part of the comment period for this change, the U.S. ethanol industry requested Japan revise the score for U.S. ethanol so we could once again access 10 percent of the market with an updated score. Additionally, Japan will be seeking to set the GHG emissions profile for new feedstocks, such as Brazilian corn as well as cassava and sugarcane from Thailand. While we appreciate the interest by Japan to expand feedstock options as they seek to implement an E10 goal by 2030, we are concerned that U.S. ethanol may not be a prioritized feedstock.

We appreciate the continued phase-down of U.S. ethanol's tariff under the United States-Japan Trade Agreement (USJTA) that entered into force on January 1, 2020. However, we understand this is only for one specific tariff line,[3] which leaves both U.S. fuel ethanol as well as industrial ethanol facing additional tariff lines. The tariff removal for non-beverage ethanol would not just further position U.S. ethanol positively as Japan seeks to implement direct E10 blending but could also improve the economic competitiveness of U.S. ethanol in the Japanese market compared to other countries that supply ethanol to Japan.[4]

We applaud the reference of ethanol as part of the $8 billion in purchases Japan committed to as part of the September 4, 2025, executive order. We appreciate USTR and the U.S. government's continued efforts to include ethanol as part of the bilateral United States-Japan discussions, including earlier statements and commitments stemming from leader meetings, such as Japan doubling its ethanol demand for both on-road and for aviation. We encourage USTR to continue the pressure and engagement with Japan on the positive role U.S. ethanol can play and to help facilitate its mutually beneficial use in Japan.

In 2024, U.S. ethanol exports to Japan (again, primarily as ETBE) are estimated to be at least 129 million gallons, which would place it as the fifth-largest ethanol market. As Japan's effective blend rate with ETBE is less than 2 percent, moving to E10 direct blending would result in significant ethanol export growth.

Mexico

Mexico has been a top, reliable export market for U.S. ethanol for both industrial and beverage purposes. In 2024, U.S. ethanol exports to Mexico hit a record 84 million gallons, valued at over $270 million. U.S. ethanol enjoys tariff-free access to Mexico. Given restrictions on blending levels, Mexico currently does not blend ethanol into its gasoline despite some pilot projects for higher-level blends, but the country is currently exploring new ways to develop their domestic ethanol industry as well as to initiate fuel ethanol blending in the country. While Mexico is seeking to develop domestic production, moving to allow E10 nationwide could result in a $1.9 billion ethanol market that could be met with U.S. imports.

Nigeria

[3] 2207.10.199

[4] Specific codes where tariff removal for U.S. ethanol could be beneficial include: 2207.20.100, 2207.20.200, 2207.10.121, 2207.10.122, 2270.10.123, 2207.10.191

Despite having an E10 policy on the books since 2007, Nigeria does not currently blend fuel ethanol. The U.S. ethanol industry has been working with Nigeria to start implementing a pilot program to use fuel ethanol. These efforts have focused on developing fuel ethanol standards, handling capacity, and integrating supply chains. While these efforts are progressing, successfully moving from the pilot phase will require a reduction of the 20 percent import tariff Nigeria levies on non-beverage ethanol. Removing this tariff, or at a minimum providing parity between ethanol and other fuel additives, will help to make larger-scale ethanol blending economically viable for U.S. ethanol exports, as well as to help support a domestic ethanol and fuel industry. Improved economics for ethanol could assist in lowering prices paid by Nigerian consumers following the May 2023 removal of its fuel subsidy on petroleum imports. Nigeria has been a steady export market for U.S. ethanol for industrial purposes, valued at nearly $44 million in 2024. If Nigeria implemented a nationwide E10 mandate, it would generate 320 million gallons of ethanol demand, largely met with imports, with an estimated value of $576 million.

United Kingdom (UK)

We applaud the recent TRQ the Administration obtained for nearly 370 million gallons of U.S. ethanol to enter the UK duty free, avoiding the £0.16/liter tariff on undenatured ethanol and a £0.085/liter tariff on denatured ethanol. This volume is approximately 150 percent of the ethanol volume exported in 2024.

Like the EU, the UK also limits the use of corn ethanol to meet its on-road emissions reduction goals (i.e. a crop cap) and prohibits the use of food-based feedstocks to meet their emissions reduction goals under their new aviation emissions policy. The UK is also putting together policy recommendations for the maritime sector, which we ask USTR to engage on to avoid limitations on U.S. corn ethanol.

Removal of crop caps and crop prohibitions would help ensure growing export markets for U.S. ethanol in what has become a significant market for U.S. ethanol since the UK initiated its E10 mandate in 2023. In 2024, the UK was the second largest export market for U.S. ethanol, with 243 million gallons valued at $535 million.

Vietnam

Vietnam has undergone several reductions in the tariff it levies on imports of U.S. ethanol over the past few years including a tariffs reduction from 10 percent to five percent in March of this year. This reduction followed a similar action in July 2023 when Vietnam lowered its tariff to 10 percent for both denatured and undenatured ethanol. Despite this reduction, the tariff continues to position U.S. ethanol at an economic disadvantage particularly compared to tariffs imposed on gasoline and other fuel additives, which are levied at either zero or three percent. A tariff removal for U.S. ethanol would also assist competitiveness for U.S. ethanol compared with ethanol from other origins, where they may have duty-free access to the Vietnam market.

With such a significant discrepancy between other fuel additives, it is even more difficult to expand the use of ethanol blending in other grades of gasoline at higher blend rates. U.S. ethanol exports to Vietnam in 2024 were valued at $15.7 million, but decreasing the tariff and increasing

blend rates to all grades of gasoline could result in significant export growth to Vietnam with improved economic competitiveness.

We are encouraged to see E10 pilot efforts in Vietnam in anticipation of the announced E10 nationwide offering starting in 2026. Continued engagement by USTR on the benefits of ethanol blending would help support E10 implementation. Nationwide E10 in Vietnam could result in 240 million gallons of export potential, which has an estimated value of $432 million. While this would not negate the overall U.S. trade deficit of $123.5 billion with Vietnam, increasing ethanol exports can play a role in reducing it.

International Bodies

Ethanol as a feedstock to produce sustainable aviation and maritime fuels is receiving increased attention from other countries who are looking to meet their emissions reduction targets as agreed to under the International Civil Aviation Organization's (ICAO) Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) and the International Maritime Organization (IMO). Updated values from this year placed U.S. corn ethanol for alcohol-to-jet as a "CORSIA Eligible Fuel". Despite recent updates to the emissions profile of U.S. corn ethanol under ICAO CORSIA, additional adjustments are needed to more scientifically and accurately portray U.S. ethanol—specifically changes such as the removal of quantitative scoring for indirect land use change, more accurate references to U.S. agricultural land use, and the incorporation of practices undertaken by farmers that reduce carbon emissions, such as no-till farming.

Without these changes, U.S. ethanol is inaccurately scored in such a way that could place it outside the eligible emissions value countries, such as Japan, may seek to implement. Conversely, there seems to be significant interest in ICAO to support Brazil in their efforts to unscientifically get an improved score for their "second crop" corn, which would undermine market demand for U.S. corn. While we appreciate the increased engagement by the U.S. government on CORSIA, we urge you to incorporate the U.S. biofuels industry within the United States expert nominations to ICAO. Otherwise, decisions and negotiations in ICAO are taking place that could unduly harm U.S. ethanol without giving the industry any means to weigh in on or ultimately shape the resulting policies.

Like ICAO for aviation, we are also eager to engage within the sustainable marine fuel sector, particularly as IMO is adopting their own greenhouse gas emissions policies. A strong U.S. government effort is needed to ensure that U.S. corn ethanol is accurately placed and well positioned to be used as a feedstock for marine fuel for those countries participating in the IMO's Net Zero Framework, or any other subsequent IMO frameworks encouraging greater use of lower emission fuels. We similarly ask for your support for strong U.S. industry representation and engagement in future discussions at the IMO. Unlike aviation, we believe that ethanol could be utilized within the maritime sector as a "drop-in" fuel to existing vessels that are already configured to run on methanol. However, without a workable pathway for U.S. ethanol under the IMO, countries would not have an incentive to utilize U.S. ethanol.

Thank you for your consideration of these comments. Growth Energy looks forward to working further with USTR to resolve unfairness issues facing U.S. ethanol.

Sincerely,

Chris Bliley
Senior Vice President of Regulatory Affairs
Growth Energy