

**Statement of Chris Bliley, Senior Vice President of Regulatory Affairs, Growth Energy  
on USTR's Section 301 Investigation on Brazil's Acts, Policies and Practices Related to  
Digital Trade and Electronic Payment Services; Unfair, Preferential Tariffs; Anti-  
Corruption Enforcement; Intellectual Property Protection; Ethanol Market Access; and  
Illegal Deforestation**

**As Prepared for Delivery on July 6, 2026**

Good morning and thank you for the opportunity to appear today. My name is Chris Bliley, and I am Senior Vice President of Regulatory Affairs for Growth Energy. Growth Energy is the nation's largest association of ethanol producers collectively representing more than half of our country's total ethanol production.

We greatly appreciate the efforts of the U.S. Trade Representative and the USTR team and strongly support the preliminary determination and proposed remedies to restore balanced trade between our countries.

As the world's leaders in ethanol production, the U.S. and Brazil enjoyed a fruitful period with only de minimis tariffs from 2011 until 2017. Since 2011, Brazilian ethanol has also enjoyed full participation in our national biofuels policy, the Renewable Fuel Standard or RFS. However, beginning in 2017, Brazil unilaterally imposed a tariff rate quota followed by straight tariffs on U.S. ethanol exported to Brazil and we've continued to see other actions and policies towards U.S. ethanol that are unfair, restrictive, and discriminatory.

For example, as mentioned, Brazil has and continues to fully participate, and economically benefit from, the RFS since its inception. Brazil has also actively participated and benefitted from state low carbon fuel policies such as those found in California, Oregon, Washington, and now New Mexico and Hawaii. Under the RFS, Brazil applied for and received an alternative compliance approach.

However, when Brazil launched its RenovaBio program in 2017, it kept out U.S. ethanol producers. Since then and despite significant engagement, Brazil has rejected U.S. requests and overtures for alternative compliance approaches and instead requires unrealistic demands on U.S. ethanol producers given the differences in our laws, agricultural practices, and supply chains. Even today after nearly a decade, there is but one approved U.S. ethanol producer on feedstock eligibility in the Renovabio program and less than one percent of its feedstock is eligible compared to Brazil's average 86 percent feedstock eligibility

Additionally, Brazil continues to stoke unfounded claims about land use change attributed to U.S. ethanol – yet the land use change and deforestation continues in Brazil. And remarkably, we are charged a land use change penalty by regulators both here and abroad for things that are occurring in Brazil. These unfounded penalties directly harm our ethanol exports to the United Kingdom, Japan, and the European Union and are inherent barriers to the use of U.S. ethanol as a marine or sustainable aviation fuel. All while Brazil continues to seek a free pass for its own producers. It makes no sense.

Thank you for recognizing the dynamics at play and recognizing the lack of transparency. Thank you as well for determining cause for action as part of this Section 301 investigation. In addition to our support for your determination and remedies, we also offer additional remedies. Specifically, until U.S. ethanol is treated more fairly by Brazil, we seek:

1. Review Brazil's participation in the RFS program given the lack of real, equitable, meaningful and fair access to Renovabio as well as continued concerns on land use and deforestation.
2. Exclude Brazilian ethanol from a duty drawback in the production of ethyl Tertiary Butyl Ether (ETBE) which is then reexported to Japan.
3. Issue a demarche to the U.S. embassies to actively refute Brazil's sustainability claims on its "second crop corn".
4. Raise RenovaBio at the World Trade Organization for the program's lack of compliance with the Technical Barriers to the Trade Agreement.
5. Review Brazil's status on the list of eligible countries as part of any future Generalized System of Preferences.
6. Ensure U.S. ethanol exports to the EU are treated no less favorably than Brazilian ethanol is treated under the EU-Mercosur trade agreement.

Thank you again for your efforts and for considering our comments and request for additional remedies. We are happy to answer any questions or provide any additional information that would assist USTR and this Section 301 committee.