



Iowa Renewable Fuels Association Annual Meeting

**Corteva
7100 NW 62nd Avenue
Johnston, IA 50131
December 11, 2025**

**8:00 am Breakfast
8:30 am Convene**

Agenda

1. Regular Order

- a. IRFA Anti-Trust Policy/Independent Board Member Policy
- b. Reading of Minutes (Sept 4 Board Meeting, Oct. 24 & Dec. 10 Exec Com.)
- c. President's Report – Chris Boshart
- d. Treasurer's Report – Telly Papasimakis
- e. Executive Director's Report – Monte Shaw
- f. Members' Update

2. Association Business

- a. IRFA Nominating Committee
- b. Election of IRFA Board and Executive Committee
- c. 2026 Board Meeting Dates
- d. 2026 IRFA Member Dues
- e. 2026 IRFA Budget
- f. Audit and Tax Providers
- g. 2026 IRFA Renewable Fuels Summit
- h. 2026/27 IRFA Members Day
- i. IRFA Policies
- j. Communications Update

3. State Priority Issues

- a. State Legislative Issues
- b. Renewable Fuels Infrastructure Program
- c. E15 Access Standard Implementation
- d. Primary Project
- e. CO2 Projects

***Note: Special guest: Ryan Clark, Iowa Geological Survey
11:30 am***

- 4. Federal Priority Issues**
 - a. RFS2
 - b. E15
 - c. Tax Credits
 - d. Low-Carbon/Higher Blends/FFVs
 - e. USDA/DOE Programs
- 5. Promotions and Programs**
 - a. Ethanol Promotion Committee
 - b. Biodiesel Promotion Committee
 - c. Membership Committee
 - d. IRFA HR Committee
 - e. IRFA PAC Committee
 - f. Co-Products Committee
 - g. Iowa Monarch Conservation Consortium
- 6. Association Meetings and Activities**
 - a. 2026 Biofuels: Science and Sustainability Tour
 - b. 2026 Inaugural Biofuels Technical Tour
 - c. State Trade Associations Meeting
 - d. IRFA Member PACs
 - e. Safety/Environmental Compliance Task Force
- 7. Other Issues**
 - a. International Trade
 - b. ASTM/NCWM Updates
 - c. IEDA Tax Credits Rulemaking
 - d. Iowa Dept. of Revenue – Biodiesel Production Tax Credit
 - e. USDA NRCS State Technical Committee
 - f. ISU Iowa Grain Quality Initiative Advisory Committee
- 8. Adjourn**

1a. IRFA Anti-Trust Policy/Independent Board Member Policy

IOWA RENEWABLE FUEL ASSOCIATION ANTITRUST POLICY AND MEETING GUIDELINES

The Antitrust Law. U.S. and state antitrust laws have as their general goal the promotion of free competition. Under the antitrust laws, competitors may not restrain competition via agreements or understandings regarding the price, production or distribution of products and services. Competitors may not engage in any activity intended to restrict the competitive capabilities of their customers, suppliers, or other competitors.

The antitrust laws are complex and often of unclear applicability. Unlawful agreements can be inferred from even circumstantial evidence. A conviction for violating the antitrust laws may result in severe penalties, both on corporations and individuals. Convicted individuals are subject to fines of up to \$100,000 and jail terms of as much as three years. Corporations may be punished by fines not exceeding \$1 million. If the lawsuit is won by a damaged individual, actual damages are automatically trebled by the court, and the defendant must pay the plaintiff's attorneys fees. Even if the antitrust case is won or settled, the demands upon the time of those involved can be very high.

Meeting Guidelines. At IRFA meetings, the following subjects will not be discussed:

1. Current or future industry prices; either prices of the industry product; or prices of inputs. (Great care must be taken in discussing past prices).
2. What constitutes a "fair" profit level.
3. Possible increases or decreases in industry prices.
4. Standardizing or stabilizing final prices.
5. Pricing procedures.
6. Cash discounts.
7. Credit terms.
8. Control of sales.
9. Allocation of markets or customers.
10. Refusals to deal with a corporation or an individual because of its pricing or marketing practices.
11. Whether or not the pricing practices of any industry member are unethical or constitute an unfair trade practice.

General Operating Procedures. To guard against unintentional conduct, all IRFA meetings shall be conducted in accordance with the following procedures.

1. A written agenda will be prepared for each meeting, and will be reviewed by legal counsel upon request of the Executive Director.
2. Accurate minutes providing a complete summary of each meeting will be prepared. The minutes of all meetings will be reviewed by legal counsel to ensure there is no misinterpretation.
3. Upon request of the Executive Director, legal counsel will be present at meetings of the Board of Directors, or of the Executive Committee, or other meetings at which sensitive issues will be discussed.
4. All Association meetings will be properly and formally scheduled; members should never hold "rump" meetings.
5. In case of doubt concerning the propriety of any topic of discussion, members will consult IRFA legal counsel prior to raising it at an IRFA meeting.
6. Should a question arise as to the propriety of remarks or discussion at an IRFA meeting, state the question. If the discussion is not terminated or the question not satisfactorily resolved, the chair shall adjourn the meeting temporarily to request advice of legal counsel. If the issue is not resolved to the satisfaction of the concerned member, that member should leave the meeting.

Outside IRFA Meetings:

1. Members shall not attend or stay at any informal meeting where there is no agenda, no minutes are taken, and no Association staff member is present.
2. Members shall not do anything before or after Association meetings, or at social events, which would be improper at a formal Association meeting.
3. Members shall alert Association staff to any improper discussion.
4. Members shall send copies to an Association staff member of any communication or documents sent, received, or developed by the member when acting for the Association.
5. Members shall alert every employee in their company who deals with the Association about the Association's Antitrust Compliance Policy.
6. Members should be conservative. If you feel an activity might be improper, ask for guidance from the Association staff in advance.

IRFA Antitrust Compliance Policy to be Read at all Meetings:

"IRFA and its officers, directors, and employees fully support and intend to comply with all applicable federal and state antitrust laws and shall not engage in anti-competitive conduct or practice, nor allow IRFA to be used by any member or other party for anti-competitive or unlawful purpose, including but not limited to the following kinds of prohibited conduct:

- a. Any discussions or effort to directly or indirectly fix, raise, lower, control, recommend, suggest, or maintain prices on products or inputs.
- b. Any contract, combination, conspiracy, discussions or effort to divide or allocate markets or customers.
- c. Any discussions or effort to engage in any boycott or considered refusal to deal.
- d. Any discussions or effort through unsanctioned industry standards, restrictions or any other method, to injure the business or trade of anyone.

Minutes will be kept of all meetings of the Board of Directors, the Executive Committee and Standing Committees. These minutes shall summarize accurately and concisely the action taken at the meeting."

The above Antitrust Policy and Meeting Guidelines was adopted by majority vote at a regular meeting of the Board of Directors of the Iowa Renewable Fuels Association, a quorum being present.

President, Ia. Renewable Fuels Assn.

Date

051130 Antitrust Policy T4224



Procedure for Determining Independent Board Members

The Iowa Renewable Fuels Association has the right to expect that all actions and decisions of its Board of Directors and Officers will be made objectively and in the best interests of the Association. Directors and executive officers must be free from undue influence of personal or outside business interests that may appear to or actually interfere with IRFA best interests.

In order to ensure that the Board of Directors and Officers are acting in the best interest of IRFA, the following procedure will be read into and included in the minutes of each board meeting.

Independent Board Member Policy

Definition of Independent Board Member

The IRS defines a voting member of the board as independent if all of the following are met at all times through the IRFA tax year;

1. The member was not compensated as an officer or other employee of the organization or a related organization
2. The member did not receive total compensation or other payments exceeding \$10,000 during the IRFA tax year from either the IRFA or a related organization, other than reimbursement under an accountable plan or reasonable compensation paid for services provided in the capacity as a member of the governing body
3. Neither the member nor any family member of the member was involved in a transaction with IRFA or a related organization within the tax year.

Disclosure Requirements

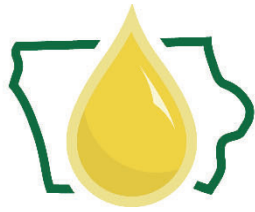
If a board member cannot meet the above requirements, they must disclose to the Board of Directors and Officers the conflict present and must abstain from voting on the transaction for which a conflict of interest exists.

Conflict of Interest Statements

Each board member will be asked to sign a Conflict of Interest Policy that asks them to disclose any potential conflicts.

1b. Reading of Minutes

Iowa Renewable



Fuels Association

Iowa Renewable Fuels Association
Quarterly Board Meeting Minutes
September 4, 2025
Chevron – Ames Office
416 Bell Avenue
Ames, IA 50010

Draft

Meeting was called to order by IRFA President Chris Boshart at 8:37 a.m.

People participating:

Member Plants:

Absolute Energy
ADM
Big River Resources
Chevron
Corn LP
Elite Octane
Gevo, Inc.
Golden Grain Energy
Homeland Energy Solutions
Lincolnway Energy
Little Sioux Corn Processors
Louis Dreyfus Company
Lakeview Plymouth Energy
Siouxland Energy
Southwest Iowa Renewable Energy
Western Dubuque Biodiesel
Western Iowa Energy
Valero

Tyler Schwarck
Rachel Geilenfeld
David Zimmerman
Paul Nees
Chris Boshart
Nick Bowdish
Kent Hartwig
Dave Sovereign
Telly Papasimakis, Zach Nosbisch
Bill Couser
Nick Bowdish
Jacob Seematter
Eamonn Byrne
Jeff Altena
Ann Reis
Tom Brooks
Brad Wilson, Kevin Ross
Craig Schoenfeld

Associate Members

BetaTec Hop Products
Bestzyme
Christianson PLLP
CTE Global
Dorsey & Whitney LLP
ICM, Inc.
Edeniq, Inc.
Encore Energy Servies

Leah Smith
Scott Allen
Jamey Cline
Matthew Ban
Michael Weaver
Rusty Johnson
Matt McBain
Kim Herzog, Stacy Rosman

Fluid Quip Technologies
Growth Energy
H2O Innovation
Hanigan Law Group
IFF
Iowa Corn
Iowa Interstate Railroad
John Deere
Kurita America
Lallemand Biofuels & Distilled Spirits
Leaf by Lesaffre
New Energy Blue
Novaspect
Phibro Ethanol
Prairie Feed and Trucking
SES
Xylogenics, Inc.
Whitefox Technologies
Veolia

Kolton Sellers
Kelly Manning
Jerry Tegels, Roger Macy, Erik Jensen
Bill Hanigan
Rachel Towey, Griffin Ford
Ryan Sauer
Justin Knox
Nate Green
Robin Herbon
Phil Shaffer
Marty Symmonds, Kristel Khalar
Kelly Davis
Allison Newell
Steve Rust
Al Giese
Candy Craig
Carl Gandolfo, Glen Austin
Jeff Scharping
Greg Haffpaur

Other Participants

Iowa Renewable Fuels Association

Monte Shaw, Lisa Coffelt, Angie Rincon,
Hannah Love

1A. IRFA Anti-Trust Policy/Independent Board Member Policy

The Board's anti-trust policy was reviewed:

"IRFA and its officers, directors, and employees fully support and intend to comply with all applicable federal and state antitrust laws and shall not engage in anti-competitive conduct or practice, nor allow IRFA to be used by any member or other party for anti-competitive or unlawful purpose, including but not limited to the following kinds of prohibited conduct:

- a. Any discussions or effort to directly or indirectly fix, raise, lower, control, recommend, suggest, or maintain prices on products or inputs.
- b. Any contract, combination, conspiracy, discussions or effort to divide or allocate markets or customers.
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The Independent Board Member Policy was reviewed:

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The IRS defines a voting member of the board as independent if all of the following are met at all times through the IRFA tax year;

1. The member was not compensated as an officer or other employee of the organization or a related organization
2. The member did not receive total compensation or other payments exceeding \$10,000 during the IRFA tax year from either the IRFA or a related organization, other than reimbursement under an accountable plan or reasonable compensation paid for services provided in the capacity as a member of the governing body
3. Neither the member nor any family member of the member was involved in a transaction with IRFA or a related organization within the tax year

Disclosure Requirements

If a board member cannot meet the above requirements, they must disclose to the Board of Directors and Officers the conflict present and must abstain from voting on the transaction for which a conflict of interest exists.

Conflict of Interest Statements

Each board member will be asked to sign a Conflict of Interest Policy that asks them to disclose any potential conflicts.

1B. Reading of Minutes

The minutes of the June 17, 2025 quarterly board meeting were reviewed.

Moved by Couser, seconded by Schwarck, to approve the minutes. Motion carried.

1C. President's Report

Boshart thanked IRFA staff, members and sponsors for the support of Member's Day and Chevron for hosting the Board Meeting. A survey will be sent out with an opportunity to share feedback on the events.

1D. Treasurer's Report

Shaw reviewed financials through end of July 2025, mentioning additional expenses in professional fees and new office furniture.

Moved by Brooks, seconded by Nees, to approve the Treasurer's report as presented. Motion carried.

1E. Executive Director's Report

Shaw congratulated Boshart as the President of the IRFA Board. Boshart was presented with the engraved IRFA President Gavel. Shaw introduced Hannah Love as the new Communications Manager and that Nathan Hohnstein no longer works for IRFA with a candidate search in process to fill the Policy Director position. Shaw will be speaking at upcoming conferences including the Argus, SAF and OPIS conferences in September.

1F. Members' Update

IRFA members reported on current activities for their respective companies.

2A. 2025 Annual Meeting Notice

Shaw shared the 2025 IRFA Annual Meeting Notice dates and events. These include the IRFA Holiday Reception at the new office location, IRFA Holiday Dinner and Fundraiser and the IRFA Annual Meeting at the Corteva Carver Center.

2B. IRFA Nominating Committee

Shaw discussed the background of the Nominating Committee.

Moved by Bowdish, seconded by Papasimakis, to approve Boshart, Wilson and Chad Kuhlert for the Nominating Committee. Motion carried.

2C. 2025 Members Day

Coffelt thanked the sponsors and IRFA staff that made Members' Day a success. She stated she received some preliminary feedback on the Coldwater Links, Sukup Endzone, and Comfort Inn. Coffelt mentioned that a survey will be sent out for additional feedback on the event.

2D. 2025 Biofuels Science and Sustainability Tour

Shaw gave a recap of the 2025 Science and Sustainability Tour. He thanked everyone in the group and the sponsors for their support.

2E. International Trade

Shaw noted US Grains Council has changed name to US Grains & BioProducts Council. He referenced documents in the board book including domestic content requirements in Canada for renewable content in both diesel fuel and gasoline, and multiple updates from countries including Vietnam, Japan, Indonesia, South Korea, and Europe. Discussion continued.

2F. ISU Iowa Grain Quality Initiative Advisory Committee

Al Giese gave an overview of his participation in the IGQIA Committee board meetings. He recommended that he remain a part of the IGQI for the next two years and then assess the value of participating under their new leadership.

Moved by Papasimakis, seconded by Wilson, for Giese to represent IRFA in the IGQIA Committee. Motion carried.

2Gi. Next Big Thing – Primary Project

Shaw noted upcoming Iowa elections, including governor, US Senate and other congressional races. Shaw discussed the need for candidates who support agriculture to run. Shaw reviewed the tiered plan on how to identify potential candidates. Discussion continued.

There was a consensus that the primary project was needed and will need member support to help target goals.

2Gii. Next Big Thing - Biofuels Tour Two

Shaw stated the Biofuels Tour Two is targeted for October 2026. Participants will consist of multiple state level representatives with a focus on the scientific and technical evaluations of farming and conservation smart agriculture as they apply to state level policies.

2H. FY2024 Form 990

Shaw referenced the copy of the 2024 Form 990 in the board book. Shaw noted that as no questions or concerns were raised, the return would be submitted.

2I. IRFA HR Committee

Coffelt gave an overview of the Human Resource Committee and referenced the participating members. She mentioned the topic of THC in the workplace and announced she is looking for a speaker to present to the committee on the topic.

2J. Communications Update

Love gave a review of the IRFA Quarterly Update, press stats, articles, social media stats.

3A. State Priority Issues - State Legislative Issues

Shaw reviewed the 2026 priorities.

Top Priorities

1. Middle Ground on IUC projects & Property Protection
2. Penalty for Failure to File Annual Retailer Report
3. Reform Biodiesel Production Tax Credit
4. Renewable Fuels Infrastructure Program Cap Removal
5. Protect Biofuel Retailer Tax Credits

There was a consensus for IRFA to proceed with 2026 Top Priorities.

3B. State Priority Issues - Renewable Fuels Infrastructure Program

The RFIP program status was reviewed. Coffelt notified the board that IRFA will not be funding any additional incentives for the Retailer Outreach contractor, Brian Kinney, for the remainder of 2025. The Retailer Outreach contract will not be renewed in 2026 by IRFA or ICGA.

3C. State Priority Issues - E15 Access Standard Implementation

Coffelt gave an overview of the E15 Access Standard Implementation Waiver and Safe Harbor correspondence sent to Iowa fuel retailers from IDALS.

3D. State Priority Issues - CO2 Projects

Shaw referenced the Summit memo, court cases and Jorde letter in the board book.

4A. Federal Priority Issues - RFS2

Shaw referenced the IRFA statement recognizing 20 years of RFS and IRFA comments submitted to EPA regarding proposed blending levels for 2026 and 2027. Shaw noted the API letter to EPA opposing reallocation of volume amounts.

4B. Federal Priority Issues - E15

Shaw referenced letter from IRFA, Iowa Farm Bureau, and ICGA expressing the need for congress to pass year-round E15 and noted Growth Energy and RFA's press releases and support of year-round E15. Shaw referenced letter from congressional members including Senator Ernst and Senator Grassley to EPA asking the agency to approve existing equipment for use with E15. Shaw mentioned John Deere is working to develop awareness of the importance for E15 on Capitol Hill.

4C. Federal Priority Issues - Tax Credits

Shaw gave an overview to the Big Beautiful Bill, including the extension for 45Z, but noted it may produce technical difficulties for SAF producers. Shaw referred to the Summit PowerPoint proposing a separate SAF production tax credit. Discussion continued.

There was a consensus for IRFA to see more details of any proposed legislation before taking a position.

4D. Federal Priority Issues - Low Carbon/Higher Blends

Shaw gave brief update on California legislation approving E15 sales year-round. Shaw mentioned Governor Newsom is supportive of AB 30 bill and is expected to sign bill – but it is California, so you never know. Shaw referenced Nebraska Ethanol Board E30 Report, CAAFI quarterly report, and Ag-Auto Work Group member updates.

4E. Federal Priority Issues - USDA/DOE Programs

Shaw announced Iowa State University has been selected to establish a BioMADE Biomanufacturing Facility in Boone. Shaw mentioned Secretary Rollins' announcement of investments for rural development projects in Iowa.

5A. Ethanol Promotion Committee

Coffelt announced Nina DeGrandis as the new intern who will primarily be managing the Drive Clean social media campaign. She mentioned continued partnerships with 4H Foundation, Driver's Education Instructors, Growth Energy's UNL88 in app promotion, RAGBRAI, and Adams County Raceway. IRFA is also supporting RFA's campaign educating retailers in California on E15.

5B. Biodiesel Promotion Committee

Coffelt mentioned the status of the on-farm biodiesel credit program, reviewed the analytics of geofence campaign for biodiesel during RAGBRAI. Coffelt noted a large donation for the Iowa Cattleman's Foundation Scholarships that was given during the IRFA sponsored steak dinner during RAGBRAI, reviewed IPTA speaker John Benish and handout developed in partnership with Growmark and Humboldt Community School District. Coffelt briefly mentioned a proposed school bus incentive program concept IRFA is developing for school districts interested in biodiesel. Shaw referenced John Deere recent announcement supporting B30 in Tier 4 engines.

5C. Membership Committee

Coffelt announced new members Dakota Access, Bestzyme and Mickelson & Co. and referenced membership rosters in the board book.

Moved by Brooks, seconded by Schwarck, to approved Geilenfeld as the new board representative for ADM. Motion carried.

5D. IRFA PAC Committee

Shaw referenced PAC report in board book.

5E. Co-Products Committee

Coffelt referenced documents in the board book

5F. Iowa Monarch Conservation Consortium

Love referenced the documents on the board book

Shaw noted that documents and reports for Section 6: Association Meetings and Activities and Section 7: Other Issues were in the board book and to contact staff with any questions. These sections included:

- 2026 IRFA Renewable Fuels Summit
- Sate Trade Association Meetings
- IRFA Member PACs
- Safety Environmental Compliance Task Force
- ASTM NCWM Updates
- DIALs Food Processing Regulations
- IEDA Tax Credits Rulemaking
- DNR – Air Quality Bureau Fee Small Working Group
- Iowa Dept. of Revenue Biodiesel Production Tax Credit
- USDA NRCS State Technical Committee

Moved by Hartwig, second by Zimmerman to adjourn the meeting. Motion passed.

The board meeting adjourned at 12:53 p.m.

IRFA Secretary

Date

Iowa Renewable Fuels Association
Executive Committee Minutes
October 24, 2025

APPROVED

Meeting was called to order by Chris Boshart at 1:33 pm.

Members participating:

Corn, LP	Chris Boshart	President
Elite Octane	Nick Bowdish	Vice President
Homeland Energy Solutions	Telly Papasimakis	Treasurer
Chevron	Paul Ness	Secretary
Western Iowa Energy	Brad Wilson	Past President
Golden Grain Energy	Chad Kuhlert	At-Large Member
Iowa Renewable Fuels Association	Monte Shaw	Executive Director

- 1A. IRFA Anti-Trust Policy

The Board's antitrust policy was read.

"IRFA and its officers, directors, and employees fully support and intend to comply with all applicable federal and state antitrust laws and shall not engage in anti-competitive conduct or practice, nor allow IRFA to be used by any member or other party for anti-competitive or unlawful purpose, including but not limited to the following kinds of prohibited conduct:

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- 1B. President's Report

In the interest of time, Boshart did not make a report.

- 2A. IRFA Pool Vehicle

Shaw reviewed details on the possible purchase of a new IRFA pool vehicle. This would replace the current IRFA Tahoe. The new purchase would include the trade in value from the current IRFA Tahoe.

Bowdish moved, seconded by Papasimakis, to recommend the purchase of a new pool vehicle to replace the current IRFA Tahoe. Motion passed.

- 2B. Shaw Vehicle Benefit

Shaw reviewed details of his current vehicle benefit. Discussion followed.

Bowdish moved, seconded by Wilson, to approve a \$1,250.00 monthly vehicle stipend for Shaw in leu of providing a company vehicle. Motion passed.

- 2C. Tax and Audit Companies for FY2025

After discussion, the Committee directed Shaw to put together an RFP for new tax and audit companies. The committee suggested contacting two companies, Meriwether and Gardiner & Company, as part of the search.

- 2D Legislative Education Donations

Shaw reviewed the recommended 2025 Legislative Education Funding donations.

Wilson moved, seconded by Papasimakis, to approve the 2025 Legislative Education Funding donations as recommended. Motion passed

- 2E E15 Thank You Fund

After discussion the Committee directed Shaw to put together funding and information on an E15 Thank You Fund to be used if our Congressional legislative champions secure nationwide, year-round E15 in 2025.

- 2F Updated Board Policies

The committee were provided copies of an updated, draft Antitrust Policy and Document Retention and Destruction Policy for review. Shaw directed the Committee to provide feedback and noted the policies would be brought before the full board in December.

- 2G POET Membership in 2026

Shaw discussed that he is reaching out to POET based on their statements a year ago that they would join IRFA in 2026, not 2025.

- 2H Proposed Merger of UP/NS Railroads

After discussion, the Committee directed Shaw that IRFA remain neutral during the regulatory process.

- 2I State Legislative Priorities

Shaw noted that board members have asked IRFA to add two legislative matters to its priority list for 2026. One recommendation was to extend current retailers renewable fuel tax credits and the other was to establish a CO2 pore space storage regulatory framework. These matters will be discussed by the full Board at its December meeting.

Papasimakis moved, seconded by Kuhlert, to adjourn the meeting. Motion passed.

The President adjourned the meeting at 2:31 pm.

IRFA Secretary

Date

1c. President's Report – Chris Boshart

1d. Treasurer's Report – Telly Papasimakis

IRFA "Checkbook"

	FY2025	Thru Nov	Projected Year End
REVENUE			
Members	\$ 1,380,650	\$1,270,467	\$1,339,467
Associate Members	\$ 120,000	\$126,450	\$126,450
Interest Income	\$ 15,000	\$13,051	\$14,150
Summit	\$ 125,000	\$127,500	\$127,500
Members Day	\$ 22,000	\$30,250	\$30,250
Tour	\$ 71,000	\$67,000	\$68,500
Other - Misc.	\$ 10,000	\$8,075	\$8,075
TOTAL REVENUE	\$ 1,743,650	\$1,642,793	\$1,714,392
EXPENDITURES			
Auto Maintenance	\$ 2,500	\$1,211	\$15,243
Insurance	\$ 9,800	\$9,420	\$9,420
Professional Fees	\$ 44,000	\$59,473	\$69,700
Supplies	\$ 7,500	\$4,684	\$5,500
Salaries & Benefits	\$ 725,000	\$572,202	\$623,000
Federal & State Taxes	\$ 8,000	\$2,520	\$11,000
Rent/Op Ex	\$ 32,000	\$15,578	\$19,580
Furniture/Equipment	\$ 63,500	\$119,809	\$119,809
IT Services	\$ 13,500	\$18,298	\$19,500
TOTAL ADMIN EXPENSES	\$ 905,800	\$803,195	\$892,752
Meeting Expense	\$ 8,000	\$5,078	\$7,000
**Members Day	\$ 20,000	\$22,997	\$22,997
Member Relations	\$ 32,500	\$20,363	\$29,500
Communications	\$ 10,000	\$6,333	\$6,500
Staff Travel	\$ 60,000	\$50,604	\$55,000
IRFA Memberships	\$ 5,000	\$5,520	\$5,520
Research & Development	\$ 73,815	\$24,065	\$24,065
Lobbying	\$ 125,500	\$96,799	\$114,300
Promo	\$ 165,000	\$52,133	\$55,000
**Summit	\$ 85,000	\$63,149	\$63,149
**Ethanol	\$ 105,000	\$55,607	\$58,000
**BioD	\$ 50,000	\$14,093	\$15,000
**Tour	\$ 75,000	\$64,818	\$64,818
**Retailer Outreach	\$ 57,000	\$61,517	\$61,517
PAC-administration	\$ 3,500	\$2,395	\$2,500
TOTAL INTERNAL PROGRAMS	\$ 875,315	\$545,471	\$584,866
PROJECTED INCOME	\$ 1,743,650	\$1,642,793	\$1,714,392
TOTAL EXPENDITURES	\$ 1,781,115	\$1,348,666	\$1,477,618
SURPLUS/(DEFICIT)	\$ (37,465)	\$294,127	\$236,774
Roll-forward surplus	\$ 380,000		\$380,000
Bottom Line	\$ 342,535		\$616,774

Iowa Renewable Fuels Association
Statement of Activities
For the Eleven Months Ended November 30, 2025

	<u>1/1/2025 - 11/30/2025</u>	<u>Budgeted</u>
Revenue		
Members	\$ 1,339,467	\$ 1,380,650
Associate members	126,450	120,000
Summit	127,500	125,000
Members day	30,250	22,000
Tour	68,500	71,000
Interest income	31,718	15,000
PAC income	31,350	-
Other income	76,744	10,000
Total Revenue	<u>1,831,979</u>	<u>1,743,650</u>
Expenditures		
<i>Administrative Expenses</i>		
Auto maintenance	1,211	2,500
Insurance	9,420	9,800
Professional fees	59,473	44,000
Supplies	4,684	7,500
Salaries & benefits	572,202	725,000
Federal & state taxes	2,520	8,000
Rent/Op ex	15,578	32,000
Furniture/Equipment	119,809	63,500
IT services	18,298	13,500
<i>Total Administrative Expenses</i>	<u>803,195</u>	<u>905,800</u>
<i>Internal Programs</i>		
Meeting expense	5,078	8,000
Members day	22,997	20,000
Member relations	20,363	32,500
Communications	6,333	10,000
Staff travel	50,604	60,000
IRFA memberships	5,520	5,000
Research & development	24,065	73,815
Lobbying	96,799	125,500
Promo	52,133	165,000
Summit	63,149	85,000
Ethanol	55,607	105,000
BioD	14,093	50,000
Tour	64,818	75,000
Retailer outreach	61,517	57,000
PAC - administration	2,395	3,500
PAC - political contributions	1,500	-
<i>Total Internal Programs</i>	<u>546,971</u>	<u>875,315</u>
Total Expenditures	<u>1,350,166</u>	<u>1,781,115</u>
Change in Net Assets	<u>\$ 481,813</u>	<u>\$ (37,465)</u>

*****No Assurance Provided*****

Iowa Renewable Fuels Association
Statement of Financial Position
As of November 30, 2025

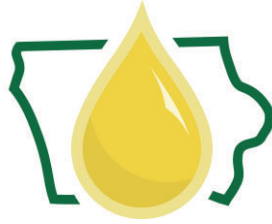
	<u>November 30, 2025</u>
Assets	
<i>Bank Accounts</i>	
Bankers Trust - 0012	\$ 946,945
Bankers Trust - Benefits - 4235	5,885
Restricted assets-IRFA PAC - 0020	<u>162,064</u>
<i>Total Bank Accounts</i>	1,114,894
 <i>Accounts Receivable</i>	
Accounts receivable	161,650
 <i>Investments</i>	
Reserve account - Paradigm	606,178
 <i>Fixed assets</i>	
Vehicles	54,588
Accumulated depreciation	<u>(54,588)</u>
<i>Total Fixed Assets</i>	-
 <i>Other Assets</i>	
Prepaid expenses	30,587
Security deposit	<u>3,998</u>
	34,585
 Total Assets	 <u><u>\$ 1,917,307</u></u>
 Liabilities and Net Assets	
<i>Liabilities</i>	
Accounts payable	\$ 92,569
Deferred revenue	<u>111,500</u>
<i>Total Liabilities</i>	204,069
 <i>Net Assets</i>	
Net assets	1,231,425
Change in net assets	<u>481,813</u>
<i>Total Net Assets</i>	1,713,238
 Total Liabilities and Net Assets	 <u><u>\$ 1,917,307</u></u>

*****No Assurance Provided*****

1e. Executive Director's Report – Monte Shaw

1f. Members' Update

2a. IRFA Nominating Committee



MEMORANDUM

TO: IRFA Board of Directors
FROM: Nominating Committee
DATE: December 11, 2025
SUBJECT: Nominations for Board of Directors and Executive Committee

Per our bylaws, each producer member of the Iowa Renewable Fuels Association is granted one voting seat on the IRFA Board of Directors. At the IRFA annual meeting, the Board votes to approve Directors, Officers, and Executive Committee members.

The Board appointed a Nominations Committee to put forth a set of nominees for these positions. Any voting member may make additional nominations from the floor during the annual meeting.

The Nominations Committee offers the following candidates for the IRFA Board of directors for the fiscal year effective January 1, 2026:

Company Member	Board Designee	Alternate
Absolute Energy	Tyler Schwarck	Rick Schwarck
ADM	Rachel Geilenfeld	Adam Kuffel
Big River Resources	David Zimmerman	Pat Edmonds
Chevron	Paul Nees	Katie Stanley
Corn, LP	Chris Boshart	Elizabeth McOllough
Elite Octane	Nick Bowdish	Patty Greteman
Gevo, Inc.	Kent Hartwig	Lindsay Fitzgerald
Golden Grain Energy	Chad Kuhlers	Dave Sovereign
Homeland Energy Solutions	Telly Papasimakis	Beth Eiler
Lakeview Plymouth Energy	Eamonn Byrne	Steve Meyer
Lincolnway Energy	Bill Couser	Seth Harder
Little Sioux Corn Processors	Nick Bowdish	Ron Wetherell
Louis Dreyfus Company	Jacob Seematter	Rita Nagle
Pine Lake Corn Processors	James Broghammer	Mike Miller
Siouxland Energy	Jeff Altena	Shane Rasset
Southwest IA Renewable Energy	Eric Fobes	Karol King
Valero Energy	Craig Schoenfeld	Troy Shaner
Western Dubuque Biodiesel	Tom Brooks	Craig Breitbach
Western Iowa Energy	Brad Wilson	Kevin Ross

In addition, the Board of Directors elects officers for a one-year term. The Nominations Committee offers the following candidates for consideration as officers for the fiscal year effective January 1, 2026:

President	Nick Bowdish, Elite Octane
Vice President	Telly Papasimakis, Homeland Energy Solutions
Treasurer	Paul Nees, Chevron
Secretary	Chad Kuhlers, Golden Grain Energy
Executive Director	Monte Shaw (non-voting)

The IRFA Executive Committee is comprised of the IRFA Officers and other members as elected by the Board. The Nominations Committee offers the following candidates for at-large positions on the IRFA Executive Committee for the fiscal year effective January 1, 2026:

Past President	Chris Boshart, Corn LP
At-large	Tyler Schwarck, Absolute Energy

2b. Election of IRFA Board & Executive Committee

2c. 2026 Board Meeting Dates

2d. 2026 Member Dues

2e. 2026 IRFA Budget

2f. Audit and Tax Providers

Tax and Audit Recommendations

Status	Company	Contact	Email	Phone	Reference
submitted	Expedition Tax Services	Larry Weigel Theresa Rohde	larry@expeditionts.com theresa@expeditionts.com	515-223-1110	MDS
submitted	Meriwether, Wilson & Co.	Todd Glynn	todd.glynn@meriwether.cpa	515-457-2674	Bowdish
Pending	Gardiner & Co.	Dennis Gardiner	dennisg@gardinercpa.com	515-270-1446	Wilson
Pending	RSM US LLP	Aurora Oliver	aurora.oliver@rsmus.com	515-237-7440	current audit
	RSM US LLP	Kathy Fairchild	kathy.fairchild@rsmus.com	515-281-9263	current tax
No bid	Clifton Larson Allen LLP	Phil Sobek	phil.sobek@claconnect.com	712-229-6637	AGC
Pending	Creative Planning/BerganKDV	Eric Thuente	eric.thuente@creativeplanning.com	319-739-2913	Brooks
submitted	RGE & Assoc	Matt Erlbacher	matte@regcpa.com		IRFA
		Zach Leonard	zachl@regcpa.com		

2g. 2026 Iowa Renewable Fuels Summit

Iowa Renewable Fuels SUMMIT

February 5, 2026
Prairie Meadows Event Center
Altoona, IA

[REGISTER NOW!](#)

[View the 2026 Program](#)

The 2026 Iowa Renewable Fuels Summit will be held at:
The Meadows Events Center at Prairie Meadows Racetrack and
Casino

1 Prairie Meadows Dr. Altoona, IA 50009



Prairie Meadows Hotel

Conveniently connected to the casino and events center.

Group ID: IAFUEL0226

Password: 863000113

[Book Now](#)

Register for the Summit:



Book your hotel room:



Thank you to our Sponsors and Exhibitors

2026 Gold Sponsors



2026 Silver Sponsors



StoneX[®]



2026 Exhibitors:

Adkins Energy

American Coalition for Ethanol

Baker Group

BASF

BetaTec Hop Products

Biodiesel Magazine

BrownWinick Law Firm

BWC

CTE Global

Eco Energy

Edeniq, Inc.

Ethanol Producer Magazine

Fluid Quip Technologies

Franzenburg

Growth Energy

Hangfa, Inc.

HTH Companies

H2O Innovation

ICM

IFF

Interstates Companies

Iowa Biotechnology Association

Iowa Central Fuel Testing Laboratory

Iowa Corn

Iowa Speedway

Iowa State University BioCentury Research Farm

JC Ramsdell Enviro Services

John Deere

John Stewart & Associates

Kemin

Lallemand Biofuels & Distilled Spirits

Miller Mechanical Specialties

Municipal Well & Pump

Novonesis

StoneX Financial

Sukup Manufacturing

Summit Carbon Solutions

Superior Environmental Solutions

Tident Automation

Waldinger Corporation

WCR

Winbec Tank Systems

Iowa Renewable



Fuels Association

PRESS RELEASE

FOR IMMEDIATE RELEASE

December 2, 2025

Press Contact: Hannah Love

515-322-0435

Former White House Press Secretary Ari Fleischer to Deliver Keynote at 2026 Iowa Renewable Fuels Summit

Feb. 5 Event is Free and Open to the Public

WEST DES MOINES, IA – The 2026 Iowa Renewable Fuels Summit will feature a unique perspective from former White House Press Secretary Ari Fleischer, who served during one of the most pivotal moments in modern history. As the nation marks the 25th anniversary of September 11th in 2026, Fleischer will reflect on what he witnessed that day and discuss where America stands today, as well as his insights on what to expect next from Washington, DC.

“Ari’s experience inside the Bush Administration during 9/11 and now as a Fox News contributor will allow our audience a very interesting range of perspectives,” said IRFA Marketing Director Lisa Coffelt. “From behind-the-scenes stories to expert observations on current events, Ari will empower Summit attendees with lessons learned and what to expect in the coming year. The format will allow ample opportunity for audience members to ask questions of a true D.C. insider.”

The 2026 Iowa Renewable Fuels Summit is taking place on February 5, 2026, and will be at the Prairie Meadows Event Center. The Summit is free and open to the public, but registration is required. To register and learn more about the Summit, please visit IowaRenewableFuelsSummit.org.

Ari Fleischer was the primary spokesperson for President George W. Bush and delivered the daily White House press briefings from 2001 to 2003. In his almost four years working for President Bush, Ari served as spokesperson during the historic presidential recount, September 11th, two wars, and the anthrax attack.

Prior to joining the Bush campaign, Fleischer was the national spokesperson and communications director for Elizabeth Dole's presidential campaign. He has also worked on Capitol Hill as a press secretary to three Congressmen and one U.S. Senator. Air is also a contributor for Fox News.

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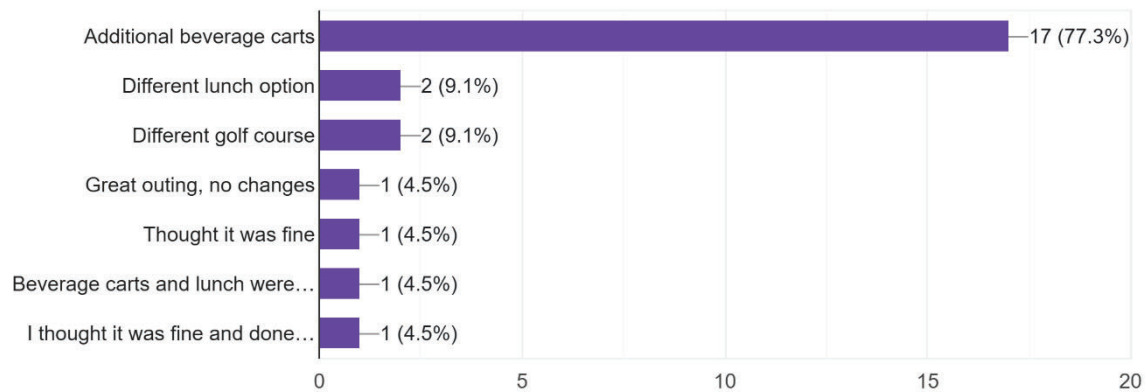
The Iowa Renewable Fuels Association represents the state's liquid renewable fuels industry and works to foster its growth. Iowa is the nation's leader in renewable fuels production with 42 ethanol refineries capable of producing 5.5 billion gallons annually – including 34 million gallons of annual cellulosic ethanol production capacity – and 8 biodiesel facilities with the capacity to produce 416 million gallons annually. For more information, visit the Iowa Renewable Fuels Association website at: www.iowaRFA.org.

2h. 2026-27 IRFA Members Day

2025 Members Day Survey

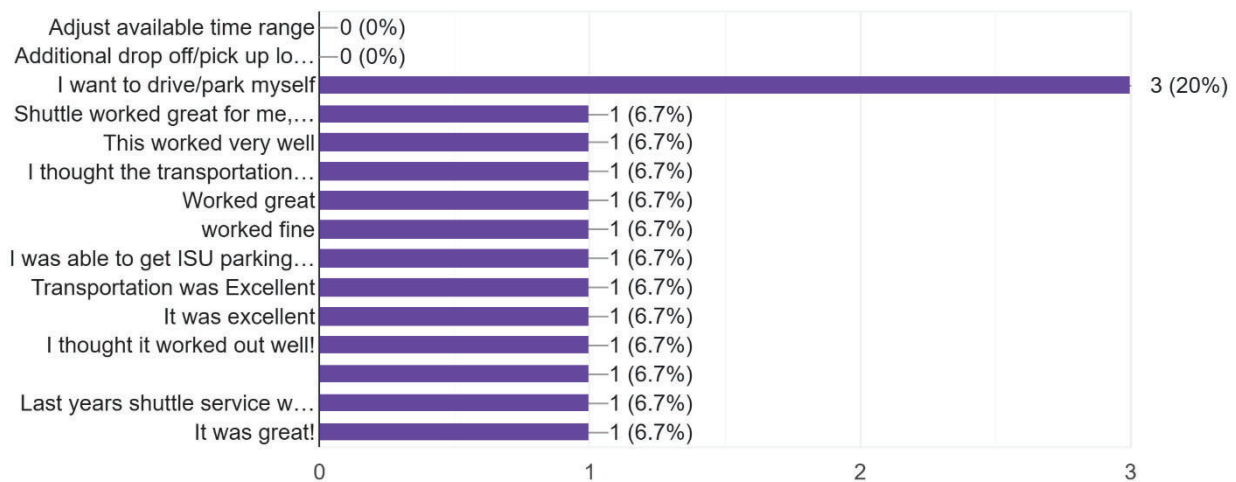
Coldwater Links Golf Course provided lunch and a beverage cart for the event. What suggestions would improve the golf experience at this course?

22 responses

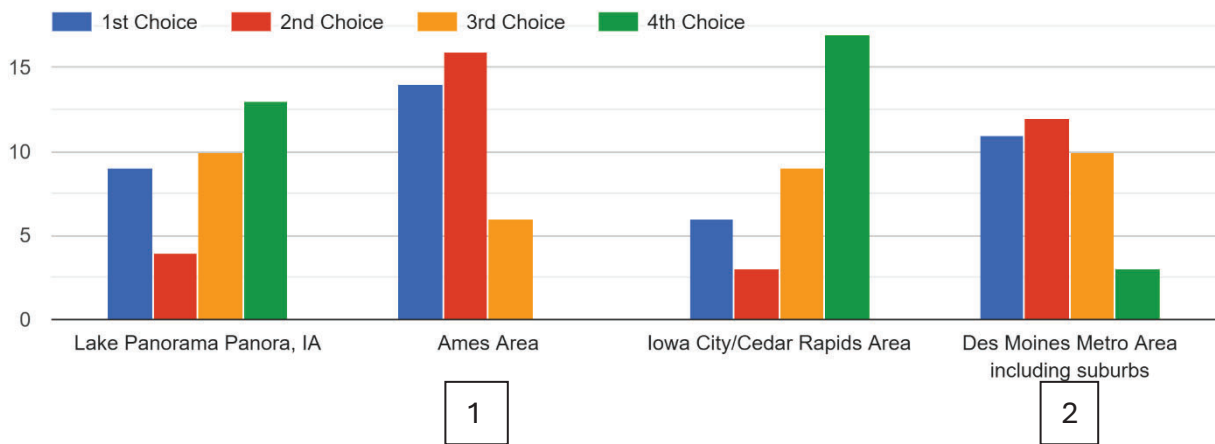


IRFA had a bus shuttle service so members did not have to drive after golf or worry about parking at the SUKUP EndZone. Can we improve the transportation available?

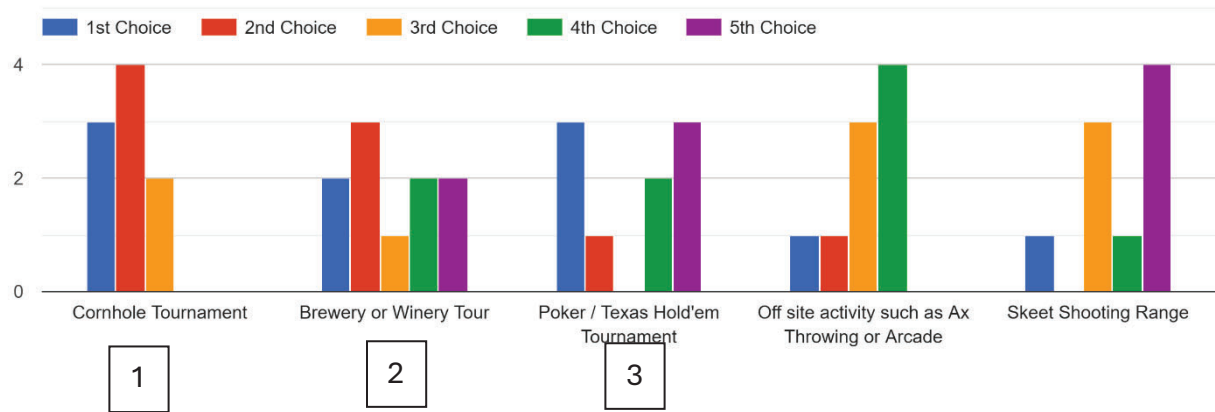
15 responses



What location would you prefer for the 2026 Members' Day? Please rank these option 1-4, with 1st choice being the best location and 4th choice being the worst location.



FOR NON GOLFERS ONLY. Which one of these NON golf options would you prefer for 2026? Please rank these options 1-5, with 1st choice being the best option and 5th choice being the worst option.



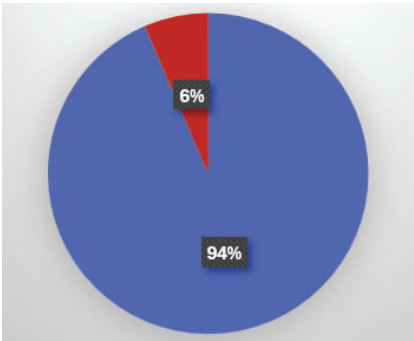
Historically, IRFA has held Members' Day on the Wednesday after Labor Day. In 2026, this day will conflict with the Iowa Corn Growers Grassroot Sum...ay/Friday event so members don't have a conflict?

36 responses



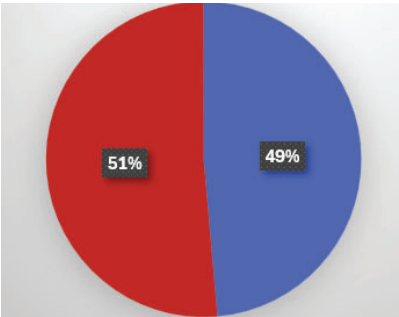
If the 2026 Members' Day event was scheduled at an upscale golf course/hotel, would members/guests be willing to pay \$25-\$50 per person to help cover the costs of golf? Be honest!

34 responses



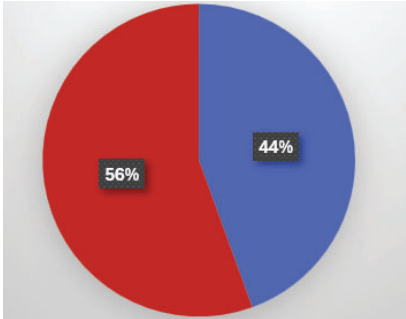
Would members be willing to travel for the 2027 Members' Day or would you only attend if the event stays in Iowa?

37 responses



For Members Day Sponsors Only. Would you be willing to consider a ONE TIME increase in sponsorships to cover additional costs for an out-of-state 25th Anniversary Members' Day?

18 responses



2i. IRFA Policies

IOWA RENEWABLE FUEL ASSOCIATION ANTITRUST POLICY AND MEETING GUIDELINES

The Antitrust Law. U.S. and state antitrust laws have as their general goal the promotion of free competition. Under the antitrust laws, competitors may not restrain competition via agreements or understandings regarding the price, production or distribution of products and services. Competitors may not engage in any activity intended to restrict the competitive capabilities of their customers, suppliers, or other competitors.

The antitrust laws are complex and often of unclear applicability. Unlawful agreements can be inferred from even circumstantial evidence. A conviction for violating the antitrust laws may result in severe penalties, both on corporations and individuals. For each offense, convicted individuals are subject to fines of up to \$1 million and jail terms of as much as ten years. Corporations may be punished for each offense by fines not exceeding \$100 million. Courts often impose prison sentences well over a year. If the lawsuit is won by a damaged individual, actual damages are automatically trebled by the court, and the defendant must pay the plaintiff's attorneys fees. Even if the antitrust case is won or settled, the demands upon the time of those involved can be very high.

Meeting Guidelines. Any type of joint effort with trade association members should be first vetted by counsel, including data exchanges and joint ventures. We also want to avoid creating the appearance of illegal collusion, or that inappropriate communications or information exchanges are taking place.

At IRFA meetings, the following subjects will not be discussed:

1. Current or future industry prices; either prices of the industry product; or prices of inputs. (Great care must be taken in discussing past prices).
2. Profit margins or what constitutes a "fair" profit level.
3. Possible increases or decreases in industry prices.
4. Standardizing or stabilizing final prices.
5. Pricing procedures, including the timing or method of price changes.
6. Cash discounts.
7. Credit terms.
8. Control of sales.
9. Allocation of markets or customers.

10. Refusals to deal with any competitor, customer, or company in the supply chain.
11. Whether or not the pricing practices of any industry member are unethical or constitute an unfair trade practice.
12. Production or sales volumes.
13. Salaries and wages, or limitations on hiring a competitor's employees.
14. Sales territories.
15. Customers.
16. Non-public, competitively sensitive information.

Stopping the Conversation: Cartel agreements are agreements between competitors to fix prices, alter output, allocate markets or customers, or rig bids. This type of behavior is per se illegal, meaning there is no justification. It is automatically illegal. If these topics come up during the meeting:

- Interrupt the meeting and suggest pausing the conversation until it can be vetted by the Executive Director and legal counsel.
- If, after vocally objecting, the conversation continues, state that you are leaving the meeting and ask that the minutes reflect your concern and departure.
- Promptly leave and immediately contact the Executive Director and legal counsel.

It is possible that, if discussion steers towards a sensitive topic, it will be less obvious or overt than the per se violations discussed above. For this or other reasons, it may not be feasible to immediately interrupt or leave the discussion. If that happens:

- Avoid participating in the discussion.
- If you feel comfortable, suggest that the discussion be delayed until vetted by counsel.
- If the discussion continues, leave as soon as possible.
- Immediately contact the Executive Director and legal counsel.

If an inappropriate discussion arises during a side conversation in which you are involved, insist that it end immediately. If it continues, announce your intent to leave because you feel it violates the law. Leave and immediately contact the Executive Director and legal counsel.

Permissible Conduct and Information Exchanges: Lawmakers and regulators recognize that trade associations and standard-setting organizations often promote competitively benign or procompetitive activities, such as:

- Collecting publicly available information about the industry, organizing it, and disseminating it to industry participants.
- Setting industry standards that increase product interoperability, compatibility, or safety.
- Creating a public website that informs customers about a complicated industry.
- Lobbying efforts.
- Coordinating collection and exchange of historical, aggregated industry data.
- Sharing non-strategic technical or scientific data that results in consumer benefits.
- Advertising to promote the industry as a whole.
- Publishing member newsletters, magazines, directories, and other resources.
- Educational initiatives

To that end, not all information exchanges with competitors are prohibited. There are safe harbors to guide information exchanges with procompetitive or benign purposes. Generally, information is not considered competitively sensitive if it is:

- Three or more months old.
- Collected and aggregated by a third party.
- Data aggregated from five or more firms, where no firm counts for more than 25% of the aggregated value, and it is impossible to identify any individual firm.
- Highly technical and nonstrategic.

Procompetitive or benign information exchanges that reduce fraud or confer consumer benefits are particularly encouraged. Nonetheless, all information exchanges with meeting attendees or trade association members should be cleared in advance with the Executive Director and legal counsel.

If you receive any documents containing non-public, competitor, or industry information at a trade association meeting (for example, if a customer gives you a document that includes information about a competitor), make a notation on the document listing the source, date, and context in which you received it, so that it is clear to a reader that the document is not evidence

of an anticompetitive information exchange. Contact the Executive Director and legal counsel, if you think the document could be viewed as evidence of prohibited activity.

General Operating Procedures. To guard against unintentional conduct, all IRFA meetings shall be conducted in accordance with the following procedures.

1. A written agenda will be prepared for each meeting, and will be reviewed by legal counsel upon request of the Executive Director. Discussions will be restricted to the identified agenda.
2. Accurate minutes providing a complete summary of each meeting will be prepared. The minutes of all meetings will be reviewed by legal counsel to ensure there is no misinterpretation. The minutes shall include: the date, time, and place; duration; the persons participating; all matters discussed; and all agreed follow-up actions.
3. Upon request of the Executive Director, legal counsel will be present at meetings of the Board of Directors, or of the Executive Committee, or other meetings at which sensitive issues will be discussed.
4. All Association meetings will be properly and formally scheduled; members should never hold "rump" meetings.
5. In case of doubt concerning the propriety of any topic of discussion, members will consult IRFA legal counsel prior to raising it at an IRFA meeting.
6. Should a question arise as to the propriety of remarks or discussion at an IRFA meeting, state the question. If the discussion is not terminated or the question not satisfactorily resolved, the chair shall adjourn the meeting temporarily to request advice of legal counsel. If the issue is not resolved to the satisfaction of the concerned member, that member should leave the meeting.

Outside IRFA Meetings:

1. Members shall not attend or stay at any informal meeting where there is no agenda, no minutes are taken, and no Association staff member is present.
2. Members shall not do anything before or after Association meetings, or at social events, which would be improper at a formal Association meeting.
3. Members shall alert Association staff to any improper discussion.
4. Members shall send copies to an Association staff member of any communication or documents sent, received, or developed by the member when acting for the Association.

5. Members shall alert every employee in their company who deals with the Association about the Association's Antitrust Compliance Policy.
6. Members should be conservative. If you feel an activity might be improper, ask for guidance from the Association staff in advance.

After the Meeting: If, after the meeting you become concerned about a topic that was discussed, immediately contact the Executive Director and legal counsel. Do not discuss the topic further with other participants.

David Repp, Attorney

Elissa Holman, Attorney

Dickinson, Bradshaw, Fowler & Hagen, P.C.

801 Grand Avenue, Suite 3700

Des Moines, Iowa 50309-3986

(515)246-4549 (p) | (816) 260-7436 (c)

IRFA Antitrust Compliance Policy to be Read at all Meetings:

"IRFA and its officers, directors, and employees fully support and intend to comply with all applicable federal and state antitrust laws and shall not engage in anti-competitive conduct or practice, nor allow IRFA to be used by any member or other party for anti-competitive or unlawful purpose, including but not limited to the following kinds of prohibited conduct:

- a. Any discussions or effort to directly or indirectly fix, raise, lower, control, recommend, suggest, or maintain prices on products or inputs.
- b. Any contract, combination, conspiracy, discussions or effort to divide or allocate markets or customers.
- c. Any discussions or effort to engage in any boycott or considered refusal to deal.
- d. Any discussions or effort through unsanctioned industry standards, restrictions or any other method, to injure the business or trade of anyone.

Minutes will be kept of all meetings of the Board of Directors, the Executive Committee and Standing Committees. These minutes shall summarize accurately and concisely the action taken at the meeting."

The above Antitrust Policy and Meeting Guidelines was adopted by majority vote at a regular meeting of the Board of Directors of the Iowa Renewable Fuels Association, a quorum being present.

President, Iowa Renewable Fuels Assn.

Date

Last updated December 11, 2025
Antitrust Policy



Iowa Renewable Fuels Association

Document Retention and Destruction Policy

The Iowa Renewable Fuels Association will follow the timelines set below in retaining records and documents.

PERSONNEL RECORDS

Record Types	Retention Period
Personnel Files (hired) Job descriptions, job applications or resumes, offer letters, signed acknowledgment of receipt and agreement with Iowa Renewable Fuels Association's employee handbook, code of conduct, policies and procedures, and any other document that requires acknowledgment. Job performance and reviews, promotions and transfers, compensation, performance appraisals, awards or acknowledgments of performance, records of attention, completion of trainings, warnings or any formal discipline, notes on attendance or tardiness, and any contract or written agreement between the employer and the employee. Exit interviews, separation checklists, notes regarding separation, resignation letter, unemployment documents, separation agreements, correspondence, and reference statements.	Permanent
State unemployment tax records	7 years
State employment forms	7 years
I-9, copies of documents reviewed for I-9 completion, E-VERIFY documents	3 years or 1 year after the date of employment termination, whichever is later
Pension plan and retirement records	Permanent

Employee benefit plans subject to ERISA (includes plans regarding health and dental insurance, 401K, long-term disability, and Form 5500)	6 years from when the record was required to be disclosed.
---	--

LEGAL AND INSURANCE RECORDS

Record Types	Retention Period
Accident reports/claims (settled cases)	7 years
Real estate documents (including loan and mortgage contracts, deeds)	Permanent
Insurance contracts and policies (Directors and Officers, General Liability, Property, and Workers' Compensation)	Permanent

ACCOUNTING AND FINANCE

Record Types	Retention Period
Accounts payable and receivables ledgers and schedules	7 years
Audit reports and financial statements	Permanent
Bank reconciliations	2 years
Bank statements, cancelled checks; deposit slips	7 years
Cash books	Permanent
Chart of accounts	Permanent
Depreciations schedules	7 years
General ledgers	Permanent
Invoices	7 years
Journal entries	7 years

CORPORATE RECORDS

Record Types	Retention Period
Contracts, notes, and leases (expired)	Permanent if current (10 years if expired)
Correspondence (general)	3 years
Correspondence (legal and important matters)	Permanently
Correspondence (routine) with customers or vendors	2 years
Board policies, resolutions, and meeting minutes; committee meeting minutes; annual member meeting minutes	Permanent
Articles of Incorporation; By-laws	Permanent
Annual corporate filings and reports to secretary of state and attorney general	Permanent

PAYROLL RECORDS

Record Types	Retention Period
Unclaimed wage records	7 years following remittance to the state treasurer
Wage rate tables	Permanent
W-2 and W-4 forms	7 years
Payroll Deductions; Garnishments; Assignments; Attachments; Earnings Records	Permanent
Payroll tax records and payroll-related tax returns	7 years
State employment Forms	7 years

TAX RECORDS

Record Types	Retention Period
Annual tax filing for the organization filed with the state and federal government.	Permanent

Last Updated: 12-5-24

CONFIDENTIALITY AGREEMENT

NonManagers in Iowa

THIS CONFIDENTIALITY AGREEMENT ("Agreement") is made this ____ day of _____, 20____ between Iowa Renewable Fuels Association, ("Company") and _____, ("Employee").

WHEREAS, the parties desire to enter into, or continue, an employment relationship wherein Employee will be given access to Company's trade secrets, proprietary and confidential business information, and customer and employee relationships.

NOW, THEREFORE, in consideration of the premises and the mutual covenants, agreements and conditions contained herein, and for other good and valuable consideration, the parties agree as follows:

1. EMPLOYMENT. Company shall employ Employee as an at-will employee pursuant to Company's usual and applicable policies and practices, as well as the terms and conditions set forth in this Agreement. At-will means that either party may terminate the employment relationship at any time, for any reason, with or without cause or prior notice. Employee shall devote Employee's full business time, attention, and loyalty to Employee's job for Company during the course of the employment relationship.

2. CONFIDENTIALITY.

a. Definitions.

i. "Disclose" shall mean to directly or indirectly divulge, convey, reproduce, summarize, reformat, show, discuss, use, or tangibly possess in verbal, written, or electronic form, the Confidential Information.

ii. "Confidential Information" shall include Company's information, knowledge, inventions, discoveries, ideas, research, methods, practices, processes, systems, formulae, designs, concepts, products, projects, improvements and developments that have unique and special value to Company and that are not generally known to the public or its competitors, which shall include but not be limited to (i) trade secrets, as defined by law; (ii) products, services, technical data, methods, and processes; (iii) financial condition, profits, indebtedness; (iv) sales, pricing, and strategic plans; (v) costs and sources of supply; (vi) identity, special needs, and requirements of customers, prospective customers, vendors, and prospective vendors; and (vii) other people and entities with whom Company has existing or prospective Business relationships. Confidential Information specifically includes information that Company has or may receive regarding existing and prospective customers of Company. Examples of Confidential Information include personal financial information of customers, banking or account information of customers, internal company launch dates, company marketing strategies, attorney-client privileged information, and other proprietary business information.

Confidential Information also includes any information Company has received from others that carries an obligation to treat it as confidential or proprietary.

iii. Notwithstanding anything in this Agreement to the contrary, nothing in this Agreement shall prohibit Employee from reporting possible violations of federal or state law or regulation to any governmental agency (*e.g.*, EEOC, NLRB, SEC, etc.) in accordance with any whistleblower protection provisions of state or federal law or regulations. Further, nothing in this Agreement should be interpreted or understood as restricting Employee from discussing the terms and conditions of Employee's employment with co-workers or union representatives in order to exercise Employee's rights under Section 7 of the National Labor Relations Act ("NLRA"). In addition, in accordance with 18 U.S.C. § 1833, (a) Employee will not be in breach of this Agreement, and will not be held criminally or civilly liable under any federal or state trade secret law (i) for the disclosure of a trade secret that is made in confidence to a federal, state, or local government official or to an attorney solely for the purpose of reporting or investigating a suspected violation of law, or (ii) for the disclosure of a trade secret that is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal; and (b) if Employee files a lawsuit for retaliation by Employer for reporting a suspected violation of law, Employee may disclose the trade secret to their attorney and may use the trade secret information in the court proceeding, so long as any document filed containing the trade secret is filed under seal, and the trade secret is not disclosed except pursuant to a court order.

b. Acknowledgments. Employee acknowledges that in the course of Company's business, it has amassed a significant body of Confidential Information, which has been acquired over a number of years and at great expense, and to which Employee has been, and will be, provided access in order to perform his/her duties, and to the body of which Employee may add in the course of performing his/her duties for Company. Employee acknowledges that Company has proprietary interests in maintaining the secrecy of its Confidential Information.

c. During Employment. During the course of the employment relationship, Employee shall exercise reasonable care to safeguard the Confidential Information, and shall only Disclose the Confidential Information as directed or permitted by Company and in order to further Company's best interests. All Confidential Information created by Employee during the employment relationship is and shall remain the sole and exclusive property of Company. Except as allowed by Company and as required for the proper performance of Employee's duties, Employee will not copy any documents, data, tapes, or other media containing the Confidential Information or remove any of the Confidential Information from Company. Upon any request of Company, Employee shall immediately return to Company any and all of the Confidential Information in Employee's possession, custody, or control. Further, Employee shall not Disclose to Company any Confidential Information belonging to any previous employer.

d. At and After Termination. Upon termination of the employment relationship, regardless of the reason for the termination, Employee shall immediately return to Company any and all Confidential Information and information about Employees that is within Employee's possession, custody, or control. Employee shall not ever, directly or indirectly, Disclose the Confidential Information or information about Employees at any manner that may disadvantage or harm Company. In addition, upon termination of the employment relationship, regardless of the reason for the termination, Employee shall immediately return to Company any and all property of Company, including but not limited to keys, passwords, passcards, identification cards, credit cards, vehicles, computers, printers, pagers, cell phones, and PDAs. This provision survives the termination of the employment relationship between Company and Employee.

3. INTELLECTUAL PROPERTY

a. Work Made For Hire

Employee agrees that all work of any sort that Employee provides during employment with Company which relates in any manner to the actual or reasonably anticipated Business, research, or other activities of Company or which is suggested by or results from any task assigned to or performed by Employee on behalf of Company, will be the absolute property of Company, and such will include but not be limited to reports, drafts, research and research notes, audits, trade secrets, software programs, source code, hardware, documentation, drawings or designs, renderings, sales and marketing plans, artwork, and descriptions, whether completed or in the process of creation, in any form whatever (collectively, the "Work"). Employee acknowledges and agrees that all Work performed or created while employed by Company will be a "work made for hire" for Company under the copyright laws of the United States. In the event any of the Work is, for any reason, deemed not a "work made for hire," or is not copyrightable material, then, in consideration of the compensation paid to Employee by Company while Employee was employed, the receipt and sufficiency of which Employee acknowledges, Employee sells and assigns to Company all rights and ownership, including all domestic and international copyrights therein, and the right to renew such copyrights, for the Work. All Work produced is the absolute property of Company and may be modified, revised, used, and reused by Company with no restriction as to frequency, manner, or duration of use. Further, Employee agrees to take any and all actions necessary, both before and after employment, and at Company's expense, so that Company may obtain and enforce its full benefit, enjoyment, rights and title in the Work, including such acts as executing documents, and assisting and cooperating in filing, registering, memorializing, prosecuting, assigning, and enforcing Company's rights in the Work.

b. Inventions

Employee assigns to Company Employee's entire right, title, and interest in any invention, idea, or work, whether patentable or not, and whether copyrightable or not, whether complete or not, which is conceived or made solely or jointly by Employee while employed by Company and which relates in any manner to the actual or reasonably anticipated Business, research, or other activities of Company or which is suggested by or

results from any task assigned to or performed by Employee on behalf of Company (“Invention”). Employee further agrees to promptly disclose to Company any and all Inventions covered by this provision, and that if requested, Employee will promptly execute a specific assignment of title to Company for such Inventions covered by this provision, and that Employee will take all reasonable actions necessary to enable Company to secure patent, copyright, or other protection in the United States and in foreign countries. Further, Employee agrees to take any and all actions necessary, both before and after employment, and at Company’s expense, so that Company may obtain and enforce its full benefit, enjoyment, rights and title in the Invention, including such acts as executing documents, and assisting and cooperating in filing, registering, memorializing, prosecuting, assigning, and enforcing Company’s rights in the Invention.

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4. REMEDIES. Employee acknowledges and agrees that breach of this Agreement will result in irreparable injury to Company such that monetary damages alone would be an inadequate remedy. In the event of an actual or threatened breach by Employee of the provisions of this Agreement, Company shall be entitled to an injunction, without posting of bond, to restrain Employee from violating this Agreement. Company may also pursue any other remedies available to it for such breach or threatened breach, including the recovery of damages and an award of reasonable attorneys’ fees from Employee. Employee agrees s/he shall pay reasonable costs and expenses incurred by Company to enforce this Agreement, including Company’s reasonable attorneys’ fees, if Company prevails in a proceeding against Employee to enforce this Agreement. Employee acknowledges and agrees that s/he has carefully considered the nature and extent of restrictions contained in this Agreement and that the rights and remedies of Company are reasonable as to time, geography, scope, and activity, and that they do not present an unreasonable burden on Employee’s ability to earn a living or pursue his/her profession.

5. MISCELLANEOUS.

a. Headings used in this Agreement are intended for convenience only and shall not be taken into consideration in the construction or interpretation of this Agreement.

b. This Agreement shall not be changed, modified, or amended, except by a written instrument signed by both parties.

c. If any portion or provision of this Agreement is held to be invalid or unenforceable by a court of competent jurisdiction, the parties agree to modify or substitute the invalid portion or provision with that which most closely approximates the economic effect and intent of the invalid portion or provision. If such modification is not possible, then the parties agree to sever the invalid portion or provision from the Agreement, which action shall not affect the validity of the remainder of this Agreement, and all other valid portions and provisions shall continue in full force and effect, to the fullest extent consistent with the law.

d. This Agreement shall be governed by and interpreted in accordance with the laws of the State of Iowa. Legal action regarding this Agreement, including its enforcement, shall be brought exclusively in the venue of Iowa District Court of Story County or the United States District Court for the Southern District of Iowa, and Employee agrees to submit to personal jurisdiction and venue in these courts.

e. Waiver by Company of the breach of any provision of this Agreement by Employee shall not operate or be construed as a complete waiver of any provision so breached or as a waiver of any subsequent breach by Employee.

f. This Agreement relates to personal services to be rendered by Employee to Company. Employee may not assign his/her rights or obligations under this Agreement. The rights and obligations of Company under this Agreement shall inure to the benefit of and shall be binding upon Company' successors and assigns.

g. Employee acknowledges and agrees that s/he has received full and adequate consideration in exchange for this Agreement. Employee further acknowledges and agrees that s/he has read, understands, and accepts this Agreement and Employee is signing and entering into it voluntarily and of his/her own free will. Employee agrees to be legally bound to all the terms and conditions in this Agreement.

h. This Agreement sets forth the entire agreement between the parties hereto, pertaining the subject matter herein, and fully supersedes any and all prior or contemporaneous agreements or understandings between the parties, whether oral or written.

EMPLOYEE NAME (printed): _____

EMPLOYEE SIGNATURE: _____ DATE: _____

CONFIDENTIALITY AGREEMENT

Managers in Iowa

THIS CONFIDENTIALITY AGREEMENT ("Agreement") is made this ____ day of _____, 20____ between Iowa Renewable Fuels Association, ("Company") and _____, ("Employee").

WHEREAS, the parties desire to enter into, or continue, an employment relationship wherein Employee will be given access to Company's trade secrets, proprietary and confidential business information, and customer and employee relationships.

NOW, THEREFORE, in consideration of the premises and the mutual covenants, agreements and conditions contained herein, and for other good and valuable consideration, the parties agree as follows:

1. EMPLOYMENT. Company shall employ Employee as an at-will employee pursuant to Company's usual and applicable policies and practices, as well as the terms and conditions set forth in this Agreement. At-will means that either party may terminate the employment relationship at any time, for any reason, with or without cause or prior notice. Employee shall devote Employee's full business time, attention, and loyalty to Employee's job for Company during the course of the employment relationship.

2. CONFIDENTIALITY.

a. Definitions.

i. "Disclose" shall mean to directly or indirectly divulge, convey, reproduce, summarize, reformat, show, discuss, use, or tangibly possess in verbal, written, or electronic form, the Confidential Information.

ii. "Confidential Information" shall include Company's information, knowledge, inventions, discoveries, ideas, research, methods, practices, processes, systems, formulae, designs, concepts, products, projects, improvements and developments that have unique and special value to Company and that are not generally known to the public or its competitors, which shall include but not be limited to (i) trade secrets, as defined by law; (ii) products, services, technical data, methods, and processes; (iii) financial condition, profits, indebtedness; (iv) sales, pricing, and strategic plans; (v) costs and sources of supply; (vi) identity, special needs, and requirements of customers, prospective customers, vendors, and prospective vendors; (vii) other people and entities with whom Company has existing or prospective Business or employment relationships; and (viii) employment information and records regarding Company's employees and personnel practices. Confidential Information specifically includes information that Company has or may receive regarding existing and prospective customers and employees of Company. Examples of Confidential Information include personal financial information of customers, banking or account information of customers,

internal company launch dates, company marketing strategies, attorney-client privileged information, employee compensation and benefits plans and strategies, employment policies, and other proprietary business information. Confidential Information also includes any information Company has received from others that carries an obligation to treat it as confidential or proprietary.

iii. Notwithstanding anything in this Agreement to the contrary, nothing in this Agreement shall prohibit Employee from reporting possible violations of federal or state law or regulation to any governmental agency (*e.g.*, EEOC, SEC, etc.) in accordance with any whistleblower protection provisions of state or federal law or regulations. In addition, in accordance with 18 U.S.C. § 1833, (a) Employee will not be in breach of this Agreement, and will not be held criminally or civilly liable under any federal or state trade secret law (i) for the disclosure of a trade secret that is made in confidence to a federal, state, or local government official or to an attorney solely for the purpose of reporting or investigating a suspected violation of law, or (ii) for the disclosure of a trade secret that is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal; and (b) if Employee files a lawsuit for retaliation by Employer for reporting a suspected violation of law, Employee may disclose the trade secret to their attorney and may use the trade secret information in the court proceeding, so long as any document filed containing the trade secret is filed under seal, and the trade secret is not disclosed except pursuant to a court order.

b. Acknowledgments. Employee acknowledges that in the course of Company's business, it has amassed a significant body of Confidential Information, which has been acquired over a number of years and at great expense, and to which Employee has been, and will be, provided access in order to perform his/her duties, and to the body of which Employee may add in the course of performing his/her duties for Company. Employee acknowledges that Company has proprietary interests in maintaining the secrecy of its Confidential Information.

c. During Employment. During the course of the employment relationship, Employee shall exercise reasonable care to safeguard the Confidential Information, and shall only Disclose the Confidential Information as directed or permitted by Company and in order to further Company's best interests. All Confidential Information created by Employee during the employment relationship is and shall remain the sole and exclusive property of Company. Except as allowed by Company and as required for the proper performance of Employee's duties, Employee will not copy any documents, data, tapes, or other media containing the Confidential Information or remove any of the Confidential Information from Company. Employee shall not, directly or indirectly, Disclose the Confidential Information in any manner that might disadvantage or harm Company. Upon any request of Company, Employee shall immediately return to Company any and all of the Confidential Information in Employee's possession, custody, or control. Further, Employee shall not Disclose to Company any Confidential Information belonging to any previous employer.

d. At and After Termination. Upon termination of the employment relationship, regardless of the reason for the termination, Employee shall immediately return to Company any and all Confidential Information and information about Employees that is within Employee's possession, custody, or control. Employee shall not ever, directly or indirectly, Disclose the Confidential Information or information about Employees at any manner that may disadvantage or harm Company. In addition, upon termination of the employment relationship, regardless of the reason for the termination, Employee shall immediately return to Company any and all property of Company, including but not limited to keys, passwords, passcards, identification cards, credit cards, vehicles, computers, printers, pagers, cell phones, and PDAs. This provision survives the termination of the employment relationship between Company and Employee.

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EMPLOYEE NAME (printed): _____

EMPLOYEE SIGNATURE: _____

DATE: _____



Iowa Renewable Fuels Association

IRFA Whistleblower Policy

General

The Iowa Renewable Fuels Association [IRFA] Code of Conduct and Professional Ethics require board members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of IRFA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all board members, employees and contractors to comply with the IRFA Code of Conduct and Professional Ethics and to report violations or suspected violations in accordance with this policy. Employees are encouraged to report unethical and/or illegal workplace activities. This policy is in response to the American Competitiveness and Corporate Accountability Act of 2002 (Sarbanes-Oxley Act).

No Retaliation

No board member, employee or contractor who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence. A board member or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within IRFA prior to seeking resolution outside the association.

Reporting Violations

The IRFA has an open-door policy and suggests that board members, employees and contractors share their questions, concerns, suggestions or complaints. In most cases, an employee's or contractor's supervisor is in the best position to address an area of concern. If contacting an employee or contractor's supervisor is not practicable, the employee or contractor will contact a member of the Executive Committee. If a board member has questions, concerns, suggestions or complaints they should be directed to the Executive Committee member, along with the Executive Director.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of business or personal ethics standards. Any allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

2j. Communications Update

Press Quick Stats

- **14** interviews completed (from September '25- present)
- IRFA mentioned/quoted in **70** publications such as OPIS, Des Moines Register, Iowa Capitol Dispatch & various ethanol/biodiesel publications (from September '25- present)
- Published **13** press releases (from September '25- present)
- Hosted Press Conference of **40+** IRFA Members & Media
- Sent **5** Congratulations Letters (from September '25-present)



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Ethanol Blog

Biofuels Groups Call For 100% Reallocation of Small-Refinery Exemptions to Uphold RFS Integrity

10/1/2025 | 1:40 PM CDT

By **Todd Neeley**, DTN Environmental Editor

Connect with Todd:

@DTNeeley



Biofuels groups told the U.S. Environmental Protection Agency that they support 100% reallocation of biofuels gallons waived from the Renewable Fuel Standard through small-refinery exemptions. (DTN file photo by Joel Reichenberger)

LINCOLN, Neb. (DTN) -- U.S. biofuels groups made it clear on Wednesday that only 100% biofuels gallons reallocation of small-refinery exemptions to the Renewable Fuel Standard would be acceptable, in public comments given during a virtual hearing hosted by the U.S. Environmental Protection Agency.

Two weeks ago, the EPA released a proposal that includes reallocating up to 100% of gallons exempted from 2023 to 2025. The proposal also asks for comment on alternatives from zero gallons to 50% or even 75% of gallons reallocated. So, full reallocation would include about 2.18 billion gallons total.

The EPA announced in August it had granted full exemptions on 63 petitions, partial exemptions on 77 petitions and denied 28 petitions on SRE requests covering 2016 to 2024.

In addition, EPA is proposing to add a new SRE reallocation volume term in the percentage standard equations for 2026 and 2027, to account for exemptions granted for the 2023-2025 compliance years.

RFA CALLS FOR INDEPENDENT SRE EVALUATIONS

Geoff Cooper, CEO of the Renewable Fuels Association, told the agency his group "strongly disagree" with EPA's new approach to determining 'disproportionate economic hardship' and believe that the agency is improperly expanding the scope of relief available to small refineries by "overreading" a legal ruling from the U.S. Court of Appeals for the District of Columbia Circuit in Sinclair Wyoming Refining Company LLC v EPA. The court ruled that the agency's decision to deny exemption requests to the RFS was contrary to law and arbitrary and capricious.

Cooper said the EPA has a duty to "independently evaluate" petitions and assess whether a small refiner has experienced disproportionate economic hardship.

"EPA should not be deferring to the DOE's long-outdated 2011 study and scoring matrix," Cooper said.

Although the Government Accountability Office in 2022 said the U.S. Department of Energy study was "critically flawed" and EPA agreed, "Nowhere in its August 2025 SRE decision document did EPA address these flaws or its past criticism of the study and scoring matrix," Cooper told the agency.

If the EPA does not decide to change the way it evaluates whether small refineries suffer economic hardship, Cooper said the agency "must reallocate 100% of those exempted volumes."

Cooper said his group supports EPA's proposal to "fully reallocate" exempt volumes for 2026 and 2027.

"As this administration recognized in 2020, reallocation is the only way for the agency to meet its statutory obligation to ensure that the required volumes are achieved," he said.

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"Partial reallocation cannot satisfy this duty. For the same reason, EPA must reallocate 100% of the exempted volumes for 2023, 2024 and 2025. Anything less would permit obligated parties to avoid their share of the statutory mandate, shifting the burden unfairly onto renewable fuel producers."

Cooper said the RFS volumes originally proposed could not be achieved without full reallocation.

GROWTH ENERGY QUESTIONS EXEMPTIONS

Growth Energy CEO Emily Skor told the agency her group believes the agency is granting more small-refinery exemptions than what was intended by the law.

"As the RFS celebrates two decades of success, refiners have had ample time to make investments in renewable fuels and higher ethanol blends," she said.

"We continue to believe that these small-refinery exemptions should only be granted sparingly and in very limited circumstances. In August, we saw EPA take a thoughtful and reasonable approach to the more than 200 pending SREs weighing on the RFS program. After clearing out the older SREs, those for 2022 and earlier, and not bloating the RIN (renewable identification numbers) bank, the agency has in this Supplemental proposal appropriately focused on the pool of exempted gallons for 2023 through 2025."

Skor said Growth Energy supports EPA's proposal to reallocate gallons to fully account for them so that biofuel demand is not lost.

"The bottom line -- if the agency follows through on the proposal, and if it properly accounts for the refinery exemptions it has granted and will grant moving forward, EPA can and will protect biofuel production and demand for U.S. farm commodities, in line with the goals of the RFS," she said.

"Given the looming crisis in the ag economy, the agency's approach promises to serve as an economic lifeline to American farmers. Beyond this proposal, we continue to urge EPA to pursue all the other avenues at its disposal to ensure the success of American biofuels and American agriculture. The agency should clear the backlog of pathway approvals for renewable fuel. It should work with Congress to support permanent year-round E15 and finalize its proposal to simplify E15 infrastructure and labeling requirements. But most importantly, the agency must move quickly to finalize the RVO proposal -- our industry cannot wait any longer."

ACE CONCERNED ABOUT RINS SUPPLY

Brian Jennings, CEO of the American Coalition for Ethanol, said the Trump administration's decision to grant SREs in August for 2023 and 2024 increased the supply of renewable identification numbers.

"Furthermore, as EPA has cautioned, if the volumes of renewable fuel represented by the SREs are not reallocated, obligated parties could use the oversupply of low-priced RINs to satisfy the 2026 and 2027 renewable volume obligations instead of buying and blending physical gallons of ethanol and other renewable fuel," Jennings said.

"This type of demand destruction undermines the integrity of the RFS. Unfortunately, demand destruction occurred in 2018 and 2019 when SREs and low RIN prices discouraged refiners from blending ethanol above E10 and artificially restrained sales of E15, E30, and E85."

Jennings said that ACE believes EPA is bound by the statute to finalize full and complete reallocation for 2026 and 2027.

"In other words, the agency must reallocate 100% of the 2023 through 2025 exempted RVOs -- an estimated 2.18 billion gallons -- to the final Set 2 rule," he said.

"The 100% full-reallocation approach is the only way to ensure blending obligations will remain whole for 2026 and 2027. Going forward, we applaud EPA for indicating it will prospectively account for and reallocate SREs as it undertakes RVO rulemakings beyond 2027."

IRFA WANTS FULL REALLOCATION

Monte Shaw, executive director of the Iowa Renewable Fuels Association, said 100% reallocation of the 2023 to 2025 exemptions is the appropriate action.

"The law requires EPA's prime directive to be ensuring RFS blending levels are met," Shaw said.

"Only full reallocation will maintain the integrity to the RFS and deliver meaningful benefits to rural America. IRFA strongly believes EPA should finalize its proposal to reallocate 100% of the exemptions over 2026-2027. We are concerned by reports that a 50% reallocation scheme is gaining steam. If EPA ultimately determines that 100% reallocation over 2026-2027 is not possible, the agency should not undermine the RFS with 50% reallocation. Instead, as an alternative, the EPA should reallocate 100% of the 2023-2025 exemptions over four years. This approach would have the same market impact in the short term as 50% reallocation but would still provide lasting support for American farmers and the biofuels industry."

Read more on DTN:

"EPA Proposes RFS Reallocation Options," <https://www.dtnpf.com/...>

Follow him on social platform X @DTNeeley

Todd Neeley can be reached at todd.neeley@dtm.com.

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[< Previous Post \(Green Plains Cashes in on \\$40 Million-\\$50 Million in 45Z Tax Credits\)](#)

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Todd Neeley



About the Author

Connect with Todd:

@DTNeeley

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Biofuels leaders: Iowa cedes its ethanol 'crown' to Nebraska with CO2 pipeline start

Iowa Renewable Fuels Association calls for greater support for carbon capture and sequestration

BY: CAMI KOONS - OCTOBER 8, 2025 4:56 PM



 Farmers, ethanol industry employees and union members at the Iowa State Capitol May 2025 voice their support for the Summit Carbon Solutions pipeline. (Photo by Cami Koons/Iowa Capital Dispatch)

Iowa biofuels and corn experts congratulated Nebraska for its first shipments of carbon dioxide on the Tallgrass Trailblazer pipeline, but said Wednesday that the development means Iowa is no longer king at turning corn into ethanol.

Monte Shaw, the executive director of Iowa Renewable Fuels Association, said now that Nebraska has a functioning CO2 pipeline, ethanol plants in the state can take advantage of lucrative tax credits from the federal government and sell into the ultra-low carbon ethanol market.

“Iowa has worn the crown,” Shaw said at a new conference Wednesday. “We have been the world’s best place to turn corn into ethanol, and we’ve held that crown for 25 years. Last week, we got knocked off.”

Trailblazer and 45z

Tallgrass' Trailblazer pipeline, which is slated to stretch several hundred miles and transport CO2 from ethanol plants in Nebraska, Colorado and Wyoming to an underground storage site in Wyoming, had its [first CO2 shipment Oct. 3](#).

The Trailblazer pipeline formerly carried natural gas, but the company was able to convert the pipeline to instead sequester liquified carbon dioxide. By sequestering the carbon dioxide created in the process of turning corn into ethanol, the plants are able to lower the “lifecycle greenhouse gas emissions” of the fuel below a certain level, set by the [U.S. Department of Energy](#), that makes the fuel eligible for a per-gallon tax credit.

These credits, known as 45z, were initiated under the Biden administration's Inflation Reduction Act. While the IRA was mostly [dismantled](#) by the Trump administration, 45z credits were [extended](#) under the Republican led tax cut law, known as the “one big beautiful bill.”

Shaw said the credits can add about 66 cents per gallon of ethanol, which is a lot for an industry that “usually tries to make a penny or two.”

Impacts to Iowa

According to [IRFA](#), Iowa produces about 4.7 billion gallons of ethanol annually. Shaw said if each of those gallons could take advantage of the credits and add 66 cents per gallon, it would equate to more than \$3 billion in added value to the industry annually.



📷 Iowa Renewable Fuels Association Executive Director, Monte Shaw at the association's annual summit, Feb. 4, 2025. (Photo by Cami Koons/Iowa Capital Dispatch)

“If Iowa wants to maintain low taxes, if we want to do further property tax reform and things of that nature, then the state needs a strong ag economy,” Shaw said. “Ethanol producers need access to the tools in this state to remain competitive with the plants around us that are moving forward.”

Steve Kuiper, vice president of Iowa Corn Growers Association, said the boost to Iowa ethanol would directly impact corn farmers by increasing demand and potential price for corn, but would also “trickle down” to the state's

economy.

Farmers have faced several years in a row of high interest rates, high input costs, and low market prices for their crops. Trade wars between the U.S. and the countries where it sells ag commodities and purchases inputs have also added [stress](#) to farmers. According to a September [survey](#) from the National Corn Growers Association, nearly 50% of U.S. farmers believe the nation is on the brink of a farm crisis.

"The Iowa agriculture economy is in tough shape," Kuiper said. "Farmers are farming at a loss. Lenders are very, very anxious right now."

Dave Miller, the chief economist with Decision Innovation Solutions, said as [corn yields](#) continue to grow, farmers need a market that accounts for an extra 150 million bushels a year through 2050.

Miller said the low-carbon ethanol market facilitated by carbon sequestration could create the potential for an additional 12 million gallons of ethanol, which he said could be fulfilled by the current farming yield increases.

"The Nebraska plants that are on the pipeline, that door has now been opened," Miller said. "So there's a real competitive advantage that's going to open up for Nebraska farmers compared to Iowa farmers."

Seth Harder, CEO of two ethanol plants in Nebraska and one in Iowa, said he has seen the things in the industry that Iowa does "really great" but he also sees that the states he operates in are on the edge of a "paradigm shift."

"As Nebraska sees this influx of funds, we hear plants are talking about not only expanding, but doubling," Harder said.

Harder said the demand for ethanol appears to be on the rise with the recent decision from California allowing the sale of a higher blend of ethanol fuel, E-15, and the prospect of more states joining in on the trend.

Challenges

Shaw said he believes Iowa is on the cusp of a "fairly substantial farm crisis."

"Nothing will solve this problem until we grow demand or reduce production, and reducing production would be devastating to the economy of Iowa in the Midwest," he said.

Carbon sequestration projects have faced challenges in Iowa, largely because of landowner opposition to CO2 pipeline projects, including the Summit Carbon Solutions pipeline. [Debate](#) on the topic caused splits among GOP lawmakers during the legislative session and has [continued](#) to be a divisive issue in the party.

The Trailblazer pipeline had fewer roadblocks than those that have popped up in Iowa. This is in part because Nebraska [does not require](#) state approval for CO2 pipelines, and because much of the pipeline was already built as the natural gas line.

Landowners and environmental groups, including the Sierra Club Iowa Chapter, that are opposed to CO2 sequestration pipelines call the Summit project a "boondoggle." Opponents worry about property values and the safety of carbon sequestration pipelines. They have also

said sequestering carbon should not qualify as a public use, which a project must have in order to use eminent domain.

Shaw said it doesn't matter what someone thinks about carbon dioxide in the atmosphere and why it should or shouldn't be sequestered, because for renewable fuel members, this is a "business decision."

The Summit Carbon Solutions pipeline is the most well known carbon sequestration project in Iowa, but Shaw said there are other companies and facilities looking for places in Iowa to sequester carbon, or to otherwise build carbon sequestration pipelines.

On the nearest horizon, Southwest Iowa Renewable Energy, or SIRE located near Council Bluffs, is [slated](#) to connect to the Trailblazer pipeline and potentially begin sequestering carbon at the plant in late 2026.

The Summit Carbon Solutions pipeline cannot begin construction in Iowa until it secures permits for storage in North Dakota and for passage through South Dakota, which has become challenging due to the enactment of a restricting law in South Dakota. The company [filed](#) to change its permit with the Iowa Utilities Commission to remove the Dakota-specific language, in the event it is able to secure a "better solution" for storage and passage.

Shaw said the "economic consequences" of the development in Nebraska could be a "bump in the road" for Iowa if the state adapts and brings its own carbon sequestration practices online, or it could lead to "production and demand flow from places like Iowa to places like Nebraska."

"We're asking the Iowa Legislature to support President Trump's energy leadership and to help avert what I personally feel is a pending farm crisis, and to help put Iowa's economy back on stable ground," Shaw said.

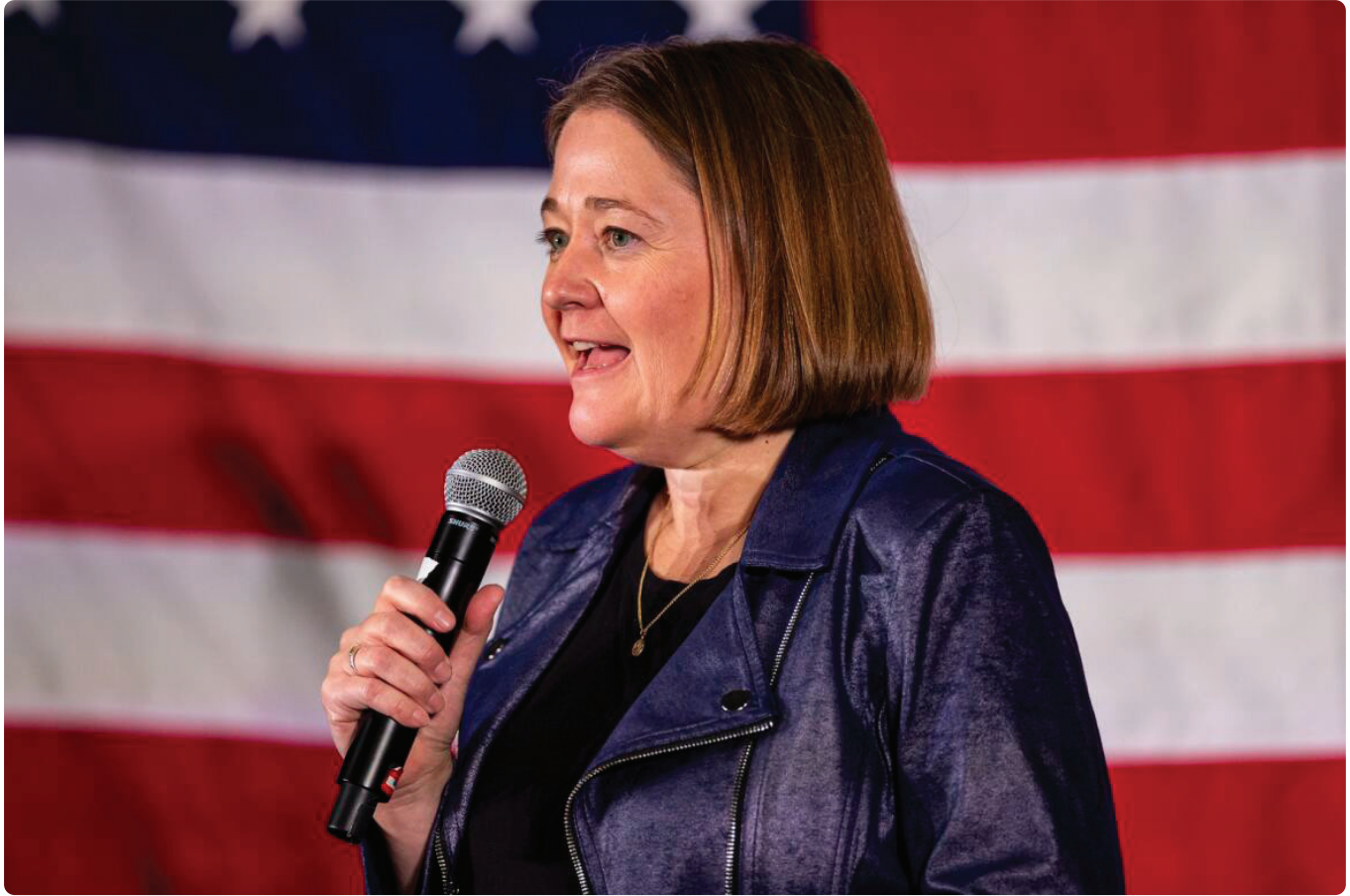
Capitol Notebook: Iowa AG urges federal probe into refinery exemptions under renewable fuels program

Also, Iowa seniors urged to review coverage as insurers drop Medicare Advantage plans and new drug price changes take effect for 2026

Gazette-Lee Des Moines Bureau

Oct. 30, 2025 4:18 pm, Updated: Oct. 31, 2025 8:02 am

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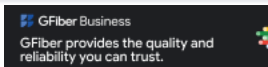
Iowa Attorney General Brenna Bird speaks Oct. 24 in Iowa City during the Triple M Tailgate fundraiser for Republican U.S. Rep. Mariannette Miller-Meeks. (Nick Rohlman/The Gazette)

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Iowa Attorney General Brenna Bird has asked the U.S. Department of Justice and other federal agencies to investigate whether some oil companies are improperly benefiting from exemptions under the Renewable Fuel Standard program meant for small refiners facing economic hardship.

[In a letter sent Wednesday](#) to the Justice Department, Department of Energy, Environmental Protection Agency, and Securities and Exchange Commission, Bird said some refineries may be “gaming the system” to receive small refinery exemptions while simultaneously reporting strong profits to investors.

The RFS requires refiners to blend renewable fuels such as ethanol into their products or buy compliance credits. Bird said some companies appear to have manipulated production to remain under the 75,000-barrel-per-day cap that qualifies them for exemptions, and have made public filings touting record profits and stock buybacks — claims she said are inconsistent with assertions of financial hardship.

“Renewable fuels are part of the backbone of Iowa’s economy,” Bird said in a statement. “The possibility that refineries are gaming the system to receive government handouts when they don’t need them hurts Iowa farmers.”

Bird, in the letter, said the RFS program “plays a critical role in setting the demand for renewable liquid fuels and the agricultural feedstocks necessary for such fuels — both of which are critical to the economic prosperity of Iowa and surrounding States.”

Attorneys general from Nebraska and South Dakota joined Bird in signing the letter, which calls on federal officials to “restore integrity” to the renewable fuels program.

The Iowa Renewable Fuels Association applauded Bird.

“In a time when crop prices are low and increased biofuels usage is a key solution, it is deeply troubling to see what appears to be an attempt by some oil refiners to game the system and avoid their legal requirements under the RFS,” Executive Director Monte Shaw said in a statement.

ADVERTISING



Iowa Biodiesel Board warns of losses, urges quick EPA action

Meanwhile, the Iowa Biodiesel Board submitted formal comments to the EPA urging the agency to swiftly finalize the 2026-2027 Renewable Fuel Standard rule and to fully reallocate nearly 200 small refinery exemptions. The group warned that failure to act could cost U.S. soybean farmers \$3.2 billion to \$7.5 billion in crop value over the next two years, citing data from the World Agricultural and Economic Environmental Services model.

“U.S. biomass-based diesel adds value to every acre of soybeans grown, accounting for roughly ten percent of each bushel’s worth — a contribution that is especially vital this year as America’s soybean farmers face record yields amid unpredictable global markets,” Iowa Biodiesel Board Executive Director Grant Kimberley said in a statement.



The production line at Atkins Energy's Ethanol and Biodiesel production facility is seen in 2023 in Lena, Ill. (Nick Rohlman/The Gazette)

The board said independent biodiesel producers in Iowa, lacking the financial reserves of larger competitors, are particularly vulnerable to prolonged regulatory uncertainty.

The board is calling on the EPA to:

- Reallocate 100 percent of small refinery exemptions for 2023 through 2027
- Finalize Renewable Volume Obligations before the new compliance year begins
- Maintain strong volume targets to ensure market certainty for farmers and producers.

Kimberley said the industry appreciates the EPA's recognition of expanded production capacity but stressed that timely rulemaking is critical as Iowa farmers already are making planting decisions for the next season.

Iowa's biodiesel industry supports 12,000 jobs and generates roughly \$3.5 billion in economic activity. In 2024, the state's 10 biodiesel plants produced an estimated 350 million gallons, making Iowa the nation's top biodiesel-producing state.

Feenstra backs strong biofuel volumes and reallocation

Also, Iowa U.S. Rep. Randy Feenstra, R-Hull, [led a bipartisan letter](#) — signed by 49 members of Congress — to EPA Administrator Lee Zeldin expressing strong support for the agency's proposed Renewable Volume Obligations under the RFS. The lawmakers urged the EPA to reallocate 100 percent of waived gallons from any granted small refinery exemptions and to finalize the rule as quickly as possible.

"A final, timely ... rule that includes strong RVOs and necessary reallocation represents the most meaningful commitment to farmers and rural communities, homegrown American energy, and affordability for consumers," Feenstra said in a statement.

Rep. Randy Feenstra, R-Iowa, speaks Oct. 24 in Iowa City during the Triple M Tailgate fundraiser for U.S. Rep. Mariannette Miller-Meeks, R-Iowa. (Nick Rohlman/The Gazette)

Feenstra, who earlier this week formally announced he is [running for Iowa governor](#) in 2026, was joined in the effort by the rest of Iowa's all-Republican congressional delegation.

In September, the EPA issued a supplemental proposal considering proposed levels of reallocation for small refinery exemptions — a key issue for Midwestern lawmakers and biofuel producers seeking market stability and fairness in implementation of the RFS.

Medicare changes ahead as open enrollment begins

FILE — A Medicare card is seen in 2024 in Portland, Ore. (Associated Press)

With the Medicare open enrollment period underway through Dec. 7, thousands of Iowans are reviewing their options amid significant changes.

According to the Iowa Insurance Division's Senior Health Insurance Information Program, major adjustments in plan offerings, drug coverage and provider networks are expected in 2026 after new federal drug pricing reforms and the 2025 cap on prescription co-payments.

The federal health insurance program provides coverage for people 65 or older, as well as younger people with certain disabilities or health conditions.

Among the biggest changes this year:

- Plan cancellations: UnitedHealthcare is canceling eight of its 10 AARP Medicare Advantage plans in Iowa, affecting about 36,500 enrollees. Wellmark is ending three of four plans with drug coverage. Beneficiaries in canceled plans must select a new plan by Jan. 1 to avoid losing coverage.
- Reduced service areas: 22 other Medicare Advantage plans have shrunk their geographic coverage, meaning some Iowans' plans may no longer be available in their county.
- Provider network changes: Several large health systems have adjusted which Medicare Advantage plans they accept, making it critical for members to confirm their providers remain in-network.
- Lower drug costs: Negotiated price reductions are taking effect for 10 high-cost drugs — Eliquis, Jardiance, Xarelto, Januvia, Farxiga, Entresto, Enbrel, Imbruvica, Stelara and Novolog/Fiasp — though costs will vary by plan.

Kristin Griffith, SHIIP and Senior Medicare Patrol director, urged Iowans to act quickly if their plan is ending or no longer offered in their area. Beneficiaries in those situations have guaranteed issue rights, allowing them to switch to another Medicare Advantage plan or return to Original Medicare and buy a Medicare supplement without medical underwriting or higher premiums — but only until Feb. 28.

"It is time individuals on Medicare to read all mail from their plan or provider and stay informed of possible changes," the Iowa Insurance Division said in a news release.

If a Medicare beneficiary receives notice that their plan has been canceled or is no longer offered in their ZIP code, "that letter is the proof required to secure the guaranteed issue right to enroll in a Medicare Supplement," according to the Insurance Division.

Last year, SHIIP-SMP helped more than 52,000 Iowans and saved clients tens of millions of dollars, according to the Insurance Division. Appointments are available statewide but are filling quickly.

Beneficiaries can compare 2026 plans online at [Medicare.gov/plan-compare](https://www.medicare.gov/plan-compare) or call 1-800-MEDICARE (1-800-633-4227) for 24/7 assistance. For local help, contact SHIIP-SMP at 1-800-351-4664 or visit shiip.iowa.gov for resources, FAQs and counselor locations.



PRESS RELEASE

FOR IMMEDIATE RELEASE
October 2, 2025

Press Contact: Hannah Love
515-322-0435

California Governor Signs Landmark E15 Legislation to Reduce State's Fuel Prices

Nationwide Year-Round E15 Could Save All Americans at the Pump

WEST DES MOINES, IA- In a historic move, California Governor Gavin Newsom today signed Assembly Bill 30 into law, authorizing the sale of gasoline blends containing up to 15% ethanol (E15) at retail fuel stations across the state. With this action, E15 is authorized for sale by all 50 states.

The California Assembly unanimously passed AB 30 on August 29, followed by unanimous approval in the State Senate (39-0) on September 3. Because AB 30 is designated as an emergency statute, it takes effect immediately, bypassing the standard January 1, 2026 implementation date.

"IRFA commends Governor Newsom and the California Legislature for their swift and decisive action," said Monte Shaw, Executive Director of the Iowa Renewable Fuels Association (IRFA). "California joins the rest of the nation in embracing the benefits of E15- lower fuel costs, reduced emissions, and increased energy independence. We're confident California drivers will welcome this cleaner, more affordable fuel option. This legislation will drive demand for E15, providing a much-needed boost for farmers."

While today's signature removes the final state level roadblock for E15, outdated federal regulations continue to make E15 nearly impossible to sell during the summer in most of the country. Areas utilizing reformulated gasoline (RFG) and 8 Midwestern states that petitioned the EPA can offer E15 year-round. The remaining conventional gasoline areas cannot.

"Today's action by California shines a bright light on the inaction in Congress," Shaw added. "It is overdue for Congress to remove the outdated regulations holding back year-round E15 access for all Americans. Every fuel retailer should be allowed to offer E15, and every American motorist should be allowed to choose E15. Not only will this save money at the pump, but it will provide a sizeable and durable market as our farmers face the worst rural economic crisis in 40 years. While we celebrate this

milestone, we urge Congress to take the next step by passing legislation to allow year-round E15 sales nationwide.”

The Iowa Renewable Fuels Association represents the state’s liquid renewable fuels industry and works to foster its growth. Iowa is the nation’s leader in renewable fuels production with 42 ethanol refineries capable of producing 4.7 billion gallons annually – including 34 million gallons of annual cellulosic ethanol production capacity – and 10 biodiesel facilities with the capacity to produce 416 million gallons annually. For more information, visit the Iowa Renewable Fuels Association website at: www.iowaRFA.org.

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Iowa Renewable



Fuels Association

PRESS RELEASE

FOR IMMEDIATE RELEASE

September 16, 2025

Press Contact: Hannah Love

515-322-0435

EPA Draft Rule on Reallocation of RFS Refinery Exemptions Creates Possible Good, Bad, and Ugly Outcomes

Full Reallocation Would Boost Farmers; Half Reallocation Effectively Cuts RFS Blending Levels and Reduces Biofuels Demand; No Reallocation Would be Gut Punch to Farmers

WEST DES MOINES, IA – The U.S. Environmental Protection Agency (EPA) today issued a draft rule regarding the potential reallocation of recently granted Renewable Fuel Standard (RFS) refinery exemptions (SREs) from years 2023 and 2024 as well as for the estimated amount SREs expected for 2025. Combined, this rule will impact over two billion gallons of renewable fuels demand. In the draft rule, EPA proposed reallocating 100% of the RFS exemptions or only 50%, while also soliciting comment on doing no reallocation at all. Any reallocated volumes would be added to the 2026-2027 RFS blending volumes under the proposal.

“Just a few weeks ago IRFA praised the EPA for committing to full reallocation in the 2026-2027 RFS rule, but that commitment should start now with 2023-2025 exemptions – not in 2026,” stated Iowa Renewable Fuels Association Executive Director Monte Shaw. “IRFA strongly supports the EPA proposal for full reallocation. The co-proposal that would reallocate only 50% of the SREs would be bad news for farmers. Make no mistake, not reallocating any RFS exemption is a direct cut to renewable fuels demand. With farmers already struggling due to low RFS levels set by the previous administration, the last thing we want to see is more cuts. We also cannot ignore that the draft rule asks for comments on doing absolutely no reallocation. That approach would be a gut punch to farmers.”

When granted, SREs allow a refinery out of their blending obligation under the landmark RFS program, which is the bedrock renewable fuels policy in the U.S. The EPA sets an RFS blending level for each year. As a result, any SRE effectively reduces the RFS blending level. To avoid this, the RFS law called on EPA to estimate the amount of SREs likely to be granted and to factor this into the RFS blending level formula each year, a process commonly referred to as “reallocation” because it essentially upholds the RFS blending level while shifting any exempted obligation from those parties to the obligated parties that did not receive exemptions.

“IRFA believes most of the RFS exemptions granted for 2023-2024 were not actually justified under sound economic analysis,” stated Shaw. “But if EPA grants them, it must reallocate them. IRFA has loudly applauded the Trump administration and the EPA for the proposing record-high RFS blend levels for 2026 and 2027. We would hate to see these volumes effectively cut by two billion gallons of un-reallocated SREs. The penalty for the failure of previous RFS rules to include SRE forecasts should not be paid by farmers and renewable fuels producers.”

The Iowa Renewable Fuels Association represents the state’s liquid renewable fuels industry and works to foster its growth. Iowa is the nation’s leader in renewable fuels production with 42 ethanol refineries capable of producing 4.7 billion gallons annually – including 34 million gallons of annual cellulosic ethanol production capacity – and 10 biodiesel facilities with the capacity to produce 416 million gallons annually. For more information, visit the Iowa Renewable Fuels Association website at: www.iowaRFA.org.

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PRESS RELEASE

FOR IMMEDIATE RELEASE

October 8, 2025

Press Contact: Hannah Love

515-322-0435

With Tallgrass Carbon Sequestration Pipeline Operational, Iowa Loses “Crown” as Best Place to Produce Corn Ethanol

Iowa Missing Out on Over \$3 Billion in Value Each Year

WEST DES MOINES, IA – With the [commencement of CO2 shipments on the Tallgrass Trailblazer pipeline](#) last week, which carries CO2 from several plants located in Nebraska to a sequestration site in Wyoming, Iowa has officially lost its “crown” as the best place in the world to produce corn ethanol. Ethanol plants able to capture and sequester CO2 can reduce their carbon intensity (CI) by up to 33 points, thereby qualifying for up to 66 cents per gallon under the federal tax credit program known as 45Z.

“Congratulations to Tallgrass for this monumental achievement,” stated Iowa Renewable Fuels Association Executive Director Monte Shaw. “Huge new markets around the world are demanding ultra-low carbon ethanol and carbon capture and sequestration (CCS) is the best tool to get there. The plants on the Tallgrass pipeline now have a leg up in many ways. IRFA will be working hard to ensure Iowa plants have access to the tools they need to compete.”

Iowa has been the most profitable place in the world to produce corn ethanol since 2000. As such, the industry expanded in the state to become the largest ethanol producer and many affiliated industries made investments in facilities and operations in Iowa. [Last year, ethanol production in Iowa added nearly \\$5.2 billion to the state GDP, increased household income by \\$2.5 billion, and supported almost 33,000 jobs.](#)

“For the first time since 2000, Iowa is no longer the best place to produce corn ethanol,” stated Shaw. “Alarm bells should be going off with any leader who values Iowa’s rural economy. We need to work to ensure this is temporary, not permanent. The huge economy-wide benefits that reverberate out from ethanol production in Iowa are not a given. If Iowa does not remain competitive, those investments will flow to areas that are competitive.”

If Iowa's 4.7 billion gallons of annual ethanol production all had access to CCS, it could generate over \$3 billion of additional value for Iowa through 45Z tax credits, recently extended by President Trump.

"Iowa needs to step up and get behind President Trump's American energy dominance vision," stated Shaw. "The [Trump administration has prioritized extending clean fuel credits](#) for American renewable fuels. Further, Trump has [championed CCS](#) as a vital tool to push America forward. As farmers face the [fear of another farm crisis](#) and ag industries continue to face economic challenges, now is the time to push CCS forward, not to stick our head in the sand."

The Iowa Renewable Fuels Association represents the state's liquid renewable fuels industry and works to foster its growth. Iowa is the nation's leader in renewable fuels production with 42 ethanol refineries capable of producing 4.7 billion gallons annually – including 34 million gallons of annual cellulosic ethanol production capacity – and 10 biodiesel facilities with the capacity to produce 416 million gallons annually. For more information, visit the Iowa Renewable Fuels Association website at: www.iowaRFA.org.

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Iowa Renewable Fuels Summit: Renewable Fuels At Work

IRFA staff is busy preparing for the 2026 Summit: Renewable Fuels At Work. The Summit theme will highlight how renewable fuels can turn challenges into opportunities and help strengthen the future of farming and domestic energy security.



The Summit will take place **February 5, 2026**, at the Prairie Meadows Event Center in Altoona. The Summit is free, but registration is required. There is still time to register, so visit iowarenewablefuelssummit.org to secure your spot!



OPIS RFS, RINS, & Biofuels Forum

Carbon Sequestration Impacts Iowa

IRFA hosted a virtual press conference October 8th discussing how Iowa's ethanol and corn markets could fall behind now that the Tallgrass CO2 pipeline is operating in Nebraska. Executive Director Monte Shaw was joined by Steve Kuiper (Iowa Corn), Seth Harder (Husker Ag) and David Miller (Decision Innovation Solutions). The speakers were joined by over 40 members of the media and IRFA members.



Demand Opportunity: Global Ethanol Summit

IRFA Executive Director Monte Shaw joined delegations from over 40 countries at the U.S. Grains & Bioproducts Council's Global Ethanol Summit in Washington, D.C. to grow emerging markets and ethanol's contributions to agricultural and economic development.



IRFA Road Trips to Promote Renewable Fuels

Executive Director Monte Shaw spoke at several conferences this fall. At the OPIS RFS, RINS, & Biofuels Forum in Chicago, Monte discussed state legislation incentivizing biofuels. At the North American SAF Conference & Expo in Minneapolis, Monte shared insights on the renewable fuels industry's evolving role and opportunities in SAF markets. Monte also spoke on a panel focusing on agriculture's role in biofuels at the Argus North American Biofuels, LCFS & Carbon Markets Summit in Monterey, California.



North American SAF Conference & Expo



Argus North American Biofuels, LCFS & Carbon Markets Summit

Members Day: Building Bridges

IRFA hosted the 14th annual Members' Day in Ames. Participants enjoyed golf, a cornhole tournament, and lots of great food and conversation. We ended the night with dinner and IRFA's PAC auction. Thank you to our sponsors for making this event possible!



IRFA Welcomes New Policy Director!

IRFA welcomed Policy Director Colin Gorton last month. Colin is responsible for state policy development, IRFA and member PACs, and state trade group collaboration.



IRFA On The Hill in November

Monte met with all six Iowa members of Congress to discuss 45Z, SRES, and biodiesel alongside Clean Fuels Alliance America, Iowa Biodiesel Board, & Iowa Soybean Association.



United Kingdom SAF Mission

At Elite Octane in November, Monte presented to a delegation from the United Kingdom to educate them on the ability to produce ultra-low carbon ethanol in the Midwest for SAF production.



IRFA Submits Comments to EPA and CARB

IRFA submitted formal comments to EPA on October 31, urging for full reallocation of refinery exemptions and for the EPA to work with federal agencies to investigate potential refiner fraud. IRFA also submitted comments to CARB regarding E15 access in California.



IRFA Meets with Iowa Leaders

Monte and Colin met with Iowa House Speaker Pat Grassley and Iowa Senate Majority Leader Mike Klimesh to discuss IRFA's 2026 legislative priorities.



IRFA Attends Growth Energy Biofuels Summit

Communications Manager Hannah Love attended Growth Energy's Biofuels Summit in Washington, D.C. in September. Hannah visited elected officials and their staff on Capitol Hill on the importance of E15. Several IRFA members attended as well.



3a. State Legislative Issues

Leadership

House (66-33 Split):

- Speaker Pat Grassley
- Majority Leader Bobby Kaufmann
- Minority Leader Brian Meyer
- Minority Whip Sean Bagniewski

Senate (33-16 Split):

- Majority Leader Mike Klimesh
- Senate President Amy Sinclair
- Minority Leader Janice Weiner
- Minority Whip Bill Dotzler

Key Committees

House:

- Agriculture – Representative Derek Wulf
- Appropriations - Representative Gary Mohr
- Commerce – Representative David Young
- Transportation – Representative Megan Jones
- Ways & Means – Representative Carter Nordman
- RIIIF Budget – Representative Jacob Bossman
- Admin Rules – Representative Chad Ingels

Senate:

- Agriculture – Senator Dawn Driscoll
- Appropriations - Senator Tim Kraayenbrink
- Commerce – Senator Mike Bousselot
- Transportation – Senator Dan Zumbach
- Ways & Means – Senator Dan Dawson
- RIIIF Budget – Senator Carrie Koelker
- Admin Rules – Senator Dave Rowley



DRAFT 2026 Iowa Statehouse Priorities

Approved Priorities:

1. Middle Ground on IUC projects & Property Protection

- Enhance landowner protections and transparency in process while supporting pathway forward for CCS projects.

2. Penalty for Failure to File Annual Retailer Report

- Disqualified retailers from biofuel retailer tax credits for failure to file annual retailer report.

3. Reform Biodiesel Production Tax Credit

- Increase the biodiesel production tax credit from \$0.04 to \$0.05 while keeping the overall cap limit the same.

4. Renewable Fuels Infrastructure Program Cap Removal

- Remove the biodiesel grant cap of \$1.5 million per year.

5. Cease Appropriations for Renewable Fuels

Infrastructure Program

- IRFA has led the charge for RFIP funding in the past. However, given the successful implementation of Iowa's E15 Access Standard and a healthy balance in the RFIP account, there is no longer a need for the \$10 million appropriation. Those funds could be better used for the priorities listed above.

Requested Priorities:

1. Extend Biofuel Retailer Tax Credits

- Extend the biofuel retailer tax credits for three years at lower rates to maintain fiscal responsibility.

2. Establish CO2 Pore Space Storage Regulations

- Iowa lacks a regulatory framework for sequestering CO2 in the state. Establish framework based on recent Nebraska law (LB 650).

North Dakota Monitor

North Dakota judge rules in favor of landowners, finds law unconstitutional

Case involving underground CO2 storage could impact Summit, other energy projects

BY: **JACOB ORLEDGE AND AMY DALRYMPLE** - DECEMBER 2, 2025 6:57 PM



Attorney Derrick Braaten and Troy Coons, head of the Northwest Landowners Association, listen during a March 27, 2025, legislative hearing. On Tuesday, a district judge ruled in favor of the landowner group in a lawsuit related to property rights. (Photo by Mary Steurer/North Dakota Monitor)

A district court judge on Tuesday sided with a landowner group and found a North Dakota law related to underground storage of carbon dioxide to be unconstitutional.

The [ruling](#) from Northeast Judicial District Judge Anthony Swain Benson could have implications for the controversial Summit Carbon Solutions pipeline project, which has a carbon dioxide storage permit from the state.

The Northwest Landowners Association in 2023 sued North Dakota and the state Industrial Commission, which approves permits for permanent underground storage of carbon dioxide. The landowner group challenged a state law that requires landowners to allow carbon dioxide storage beneath their property if at least 60% of the affected landowners agree to the project.

Benson writes in his order that the state law is unconstitutional because it allows a government-authorized taking of property without an avenue for “just” compensation determined by a jury.

In this case, the property is pore space – cavities in underground rock formations where emissions can be trapped.

“The court is basically saying the constitution trumps that law, so that law can’t be enforced,” said Derrick Braaten, attorney for the landowner group.

North Dakota Attorney General Drew Wrigley said late Tuesday his office was beginning to evaluate “possible legal avenues forward.”

“It’s a critically important question, and one where we believe the state, the duly elected state Legislature, properly balanced all of the interests involved and reached an outcome that respects private property rights, but also the needs of an economy moving forward,” Wrigley said.

In the case of Summit, about 92% of landowners in the storage area had chosen to participate in the project when the Industrial Commission [approved the storage permit](#) last year.

Troy Coons, chair of the Northwest Landowners Association, encouraged companies to move forward by working with landowners to obtain 100% voluntary participation in carbon storage projects. When that isn’t possible, eminent domain could be used for projects that have a public benefit, Braaten said.

“Be a good partner. Show us it’s a good project, people will be involved,” Coons said.

Braaten said he believes the judge’s decision voids all orders issued by the Industrial Commission to require the participation of landowners in a carbon storage facility, a process known as amalgamation.

Wrigley said he was still digesting the order late Tuesday and could not comment on potential impacts to project permits.

Benson initially [dismissed the landowner group’s lawsuit](#), citing procedural issues. In August, the North Dakota Supreme Court [sent the case back to the district court](#) for another look.

Summit Carbon Solutions and other energy companies with carbon dioxide storage projects in the works [intervened in the case](#) in support of North Dakota law. The North Dakota Farm Bureau and other landowners joined the landowner group in the lawsuit.

Braaten said he anticipates the state and Summit will likely appeal to the state Supreme Court.

Meanwhile, Braaten is representing a group of landowners [challenging the legality](#) of the permit granted by the Industrial Commission for Summit Carbon Solutions’ carbon storage project. The parties are awaiting a decision from South Central Judicial District Judge Jackson Lofgren in that case.

Summit proposes to transport emissions from ethanol plants in five states via pipeline for permanent storage in North Dakota.

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF BOTTINEAU

NORTHEAST JUDICIAL DISTRICT

Northwest Landowners Association, Mike
Dresser, Sandra Short, The Swanson Living
Trust, and North Dakota Farm Bureau, Inc.,

Plaintiffs,

vs.

State of North Dakota, North Dakota Industrial
Commission, Hon. Douglas Burgum in his
official capacity as Governor of the State of North
Dakota and as the Chairman and a member of the
North Dakota Industrial Commission, and Hon.
Drew Wrigley in his official capacity as Attorney
General of North Dakota and as a member of the
North Dakota Industrial Commission, and Hon.
Doug Goehring in his official capacity as
Agricultural Commissioner of North Dakota and
as a member of the North Dakota Industrial
Commission,

Defendant,

and

SCS Carbon Transport LLC, Minnkota Power
Cooperative, Basin Electric Power Cooperative,
and Dakota Gasification Co.,

Intervenor-Defendants.

**Memorandum Opinion and
Order Granting Summary
Judgment to Plaintiffs and
Denying Summary Judgment
to Defendants and
Intervenor-Defendants**

Case Number: 05-2023-CV-00065

[¶1] This action is before the Court following a remand by the North Dakota Supreme Court in the decision Northwest Landowners Ass'n v. State, 2025 ND 147, 25 N.W.3d 220 (hereafter “NWLA II”). For brevity, “Defendants” will refer to Defendants and Intervenor-Defendants herein. The sole remaining claim upon remand is the merits of Plaintiffs’ constitutional challenge of the amalgamation provisions in N.D.C.C. ch. 38-22. NWLA II, at ¶ 34. The NWLA II decision disposed of the issues regarding statute of limitations, standing, and failure to exhaust administrative remedies. Id. at ¶¶ 8-31. The Court summarized the remaining legal claim in ¶ 31 (emphasis added):

[Plaintiffs] assert the laws, as implemented by NDIC orders approving permits, authorize the injection of carbon dioxide into their pore space without prior payment of just compensation. In other words, the Plaintiffs claim they have or will suffer an unconstitutional physical invasion of their property.

[¶2] On September 5, 2025, this Court sent all counsel correspondence indicating the Court would consider the remaining motions for summary judgment pertaining to this issue based upon prior briefing, unless concerns or objections were raised. *Index* 267. There were no objections or requests for further oral argument and this Court took the matter under advisement.

[¶3] Having considered the motions by all parties, as well as the briefs, responses, replies, oral argument, the record and the pleadings, the Court now enters this Memorandum Opinion and Order Granting Summary Judgment to Plaintiffs and Denying Summary Judgment to Defendants and Intervenor-Defendants.

MEMORANDUM OPINION

[¶4] **Summary Judgment Legal Standards.** A party claiming relief may move, with or without supporting affidavits, for summary judgment on all or part of a claim. N.D.R.Civ.P. 56(a). Our standard of review for summary judgments is well established:

Summary judgment is a procedural device under N.D.R.Civ.P. 56(c) for promptly resolving a controversy on the merits without a trial if there are no genuine issues of material fact or inferences that can reasonably be drawn from undisputed facts, or if the only issues to be resolved are questions of law. The party seeking summary judgment must demonstrate there are no genuine issues of material fact and the case is appropriate for judgment as a matter of law. In deciding whether the district court appropriately granted summary judgment, we view the evidence in the light most favorable to the opposing party, giving that party the benefit of all favorable inferences which can reasonably be drawn from the record. A party opposing a motion for summary judgment cannot simply rely on the pleadings or on unsupported conclusory allegations. Rather, a party opposing a summary judgment motion must present competent admissible evidence by affidavit or other comparable means that raises an issue of material fact and must, if appropriate, draw the court's attention to relevant evidence in the record raising an issue of material fact. When reasonable persons can reach only one conclusion from the evidence, a question of fact may become a matter of law for the court to decide.

N.D. Private Investigative & Sec. Bd. v. TigerSwan, LLC, 2019 ND 219, ¶ 8, 932 N.W.2d 756 (citations omitted). The Court analyzes the competing motions for summary judgment by these standards.

[¶5] **Challenged Statute.** Plaintiffs challenge the constitutionality of N.D.C.C. Chapter 38-22 – Carbon Dioxide Underground Storage (hereafter “CO2 Storage statute”). Before issuing a permit, the North Dakota Industrial Commission (“NDIC”) shall find that all nonconsenting pore space owners “are or will be equitably compensated.” N.D.C.C. § 38-22-08(14). Regarding consent, N.D.C.C. § 38-22-10 indicates:

If a storage operator does not obtain the consent of all persons who own the storage reservoir's pore space, the commission may require that the pore space owned by nonconsenting owners be included in a storage facility and subject to geologic storage.

Once the carbon capture project is completed, “[t]itle to the storage facility and to the stored carbon dioxide **transfers, without payment of any compensation,** to the state.” N.D.C.C. § 38-22-17(6)(a) (emphasis added).

[¶6] As noted above, the NWLA II decision determined Plaintiffs have standing, this Court has jurisdiction, and neither the failure to exhaust administrative remedies nor the statute of limitations bar this particular statutory challenge by Plaintiffs.

[¶7] **Unconstitutional Takings Analysis.** The analysis of whether the CO2 Storage statute is unconstitutional as argued by Plaintiffs was outlined in a 2022 case, Northwest Landowners Ass'n v. State, 2022 ND 150, ¶ 16 and 19, 978 N.W.2d 679 (hereafter “NWLA I”):

The Fifth Amendment guarantees that private property shall not “be taken for public use, without just compensation.” U.S. Const. Amend. V. “The takings clause of the Fifth Amendment is made applicable to the states through the Fourteenth Amendment.” *Wild Rice River Estates, Inc. v. City of Fargo*, 2005 ND 193, ¶ 12, 705 N.W.2d 850. The North Dakota Constitution provides overlapping and broader protection against government interference with property rights: “Private property shall not be taken or damaged for public use without just compensation having been first made to, or paid into court for the owner.” N.D. Const. art. I, § 16. It “was intended to secure to owners, not only the possession of property, but also those rights which render possession valuable.” *Grand Forks-Traill Water Users, Inc. v. Hjelle*, 413 N.W.2d 344, 346 (N.D. 1987).

To establish a violation under the Takings Clause, challengers must demonstrate they have a property interest that is constitutionally protected. *Phillips v. Wash. Legal Found.*, 524 U.S. 156, 164, 118 S.Ct. 1925, 141 L.Ed.2d 174 (1998). “Because the Constitution protects rather than creates property interests, the existence of a property interest is determined by reference to ‘existing rules or understandings that stem from an independent source such as state law.’” *Id.*

[¶8] The NWLA I case involved saltwater injection into pore space. The NWLA I decision analyzed state law and legislative intent, and the North Dakota Supreme Court concluded that surface owners “**have a constitutionally protected property interest in pore space that is recognized under state law.**” *Id.* at ¶ 22. This Court concludes the pore space interest at issue here is a constitutionally protected property interest subject to a takings analysis.

[¶9] Defendants argue the proper standard to determine whether a government-authorized invasion of non-surface property constitutes a taking is found in U.S. v. Causby, 328 U.S. 256, 266, 66 S. Ct. 1062 (1946). The Court in Causby concluded such an invasion constituted a taking only if it amounts to “a direct and immediate interference with the enjoyment and use of the land.” *Id.*

[¶10] Plaintiffs argue the standard to apply in the present case is found in Loretto v. Teleprompter Manhattan CATV Corp., 458 U.S. 419, 102 S.Ct. 3164 (1982) and was used in the taking analysis in NWLA I: “[W]here government requires an owner to suffer a permanent physical invasion of her property—however minor—it must provide just compensation.” NWLA I, at ¶ 23 (citing Loretto and Wild Rice River Estates, Inc. v. City of Fargo, 2005 ND 193, ¶ 13, 705 N.W.2d 850).

[¶11] Both the State and Continental Resources had argued in appellant briefs in NWLA I that Causby should apply to pore space as opposed to Loretto. See NWLA I Appellant Brief of Continental Resources at ¶¶ 50-51 and Appellant Brief of State of North Dakota at ¶¶ 52-54. It is clear the North Dakota Supreme Court rejected those arguments and applied Loretto. See NWLA I, at ¶¶ 23-28.

[¶12] This Court finds the factual distinctions between the present case involving pore space invasion and NWLA I weigh even more heavily in favor of applying Loretto here, as outlined in more detail below.

[¶13] As explained in NWLA I, ¶ 25 (internal citations omitted) (emphasis added):

Government-authorized physical invasions of property constitute the “clearest sort of taking” and therefore are a per se taking. “[A]n owner suffers a special kind of injury when a stranger directly invades and occupies the owner's property.” A physical invasion “is qualitatively more severe than a regulation of the use of property ... since the owner may have no control over the timing, extent, or nature of the invasion.” Further, **regardless of whether the physical occupation is permanent or temporary, just compensation is required.** Even if the physical invasion has only minimal economic impact on the owner, **compensation is required because when there is a physical occupation of property, it effectively destroys the owner's rights to possess, use, and dispose of the property.** Further, because government-authorized physical invasions take away the landowner's right to exclude - “one of the most treasured” rights of property ownership - they are a per se taking.

[¶14] A “permanent physical invasion” is a per se taking because “the owner's right to exclude others from entering and using her property [is] perhaps the most fundamental of all property interests.” Wild Rice River, at ¶ 13. Loretto also concluded that “a permanent physical occupation authorized by government is a taking without regard to the public interests that it may serve.” Id. at 426 (emphasis added). In other words, whether appropriation of a property owner's pore space to store CO₂ is in the public interest is not dispositive of whether the statute allowing the same poses an unconstitutional taking.

[¶15] As noted in Tahoe-Sierra Pres. Council, Inc. v. Tahoe Reg'l Planning Agency, 535 U.S. 302, 322–23, 122 S. Ct. 1465, 1478–79 (2002):

When the government physically takes possession of an interest in property for some public purpose, it has a categorical duty to compensate the former owner, *United States v. Pewee Coal Co.*, 341 U.S. 114, 115, 71 S.Ct. 670, 95 L.Ed. 809 (1951), regardless of whether the interest that is taken constitutes an entire parcel or merely a part thereof. Thus, compensation is mandated when a leasehold is taken and the government occupies the property for its own purposes, even though that use is temporary. *United States v. General Motors Corp.*, 323 U.S. 373, 65 S.Ct. 357, 89 L.Ed. 311 (1945); *United States v. Petty Motor Co.*, 327 U.S. 372, 66 S.Ct. 596, 90 L.Ed. 729 (1946). Similarly, when the government appropriates part of a rooftop in order to provide cable TV access for apartment tenants, *Loretto v. Teleprompter Manhattan CATV Corp.*, 458 U.S. 419, 102 S.Ct. 3164, 73 L.Ed.2d 868 (1982); or when its planes use private airspace to approach a government airport, *United States v. Causby*, 328 U.S. 256, 66 S.Ct. 1062, 90 L.Ed. 1206 (1946), it is required to pay for that share no matter how small.

[¶16] Unlike a temporary flight in airspace far overhead, or allowing installation of cable television components on a rooftop, which could be argued to cause little or no interference, the pore space invasion here is much more extensive.

[¶17] Under the CO2 Storage statute, storage operators could inject millions of metric tons of CO2 into pore space, store it for an undetermined amount of time, and eventually title of the carbon and the storage facility transfers to the State of North Dakota. In more generalized terms, a landowner's constitutionally protected pore space property interest is subject to a private company's physical invasion authorized by the State of North Dakota, for an undetermined number of years - which could span decades, and then that landowner's constitutionally protected pore space property interest is permanently titled to the State of North Dakota under N.D.C.C. § 38-22-17(6)(a) once the carbon capture project is completed.

[¶18] This Court concludes N.D.C.C. Chapter 38-22 clearly contains a government-authorized physical invasion of an interest in property, and interferes with a landowner's use and enjoyment of property, including, but not limited to, a landowner's right to exclude others.

[¶19] **Just Compensation.** Having concluded N.D.C.C. Chapter 38-22 allows a government-authorized physical invasion of property constituting the "clearest sort of taking" and a per se taking, the Court must next determine whether there is just compensation provided for said taking.

[¶20] Defendants argue the present case is distinguished from NWLA I as that case deprived surface owners from demanding compensation for physical occupation of pore space, while N.D.C.C. Chapter 38-22 does not deprive surface owners of compensation. Plaintiffs counter that the compensation scheme in N.D.C.C. Chapter 38-22 is nonetheless unconstitutional, as it fails to provide for *just* compensation as provided by Article I, § 16, N.D. Const.

[¶21] This Court agrees N.D.C.C. Chapter 38-22 provides for “compensation,” but clearly does not provide “just compensation” as defined in North Dakota.

[¶22] Defendants rely on Martin v. Tyler, 60 N.W. 392, 400 (N.D. 1894) to argue a jury need not determine compensation in a taking such as this.

First it speaks of “just compensation” as applied generally. It then creates the exceptional class, and for that class it demands “full compensation,” and adds “which compensation shall be ascertained by a jury.” Ordinarily, these words would not include both characters of compensation, but would include that last under discussion, to wit, full compensation; and such we think was the intention.

The Martin court relied on specific language in the “takings” provision that limited a jury determination to a certain class. However, that language was amended in 1956. See Article amendment 66, H.C.R. “O”, approved June 26, 1956. The amendment put the language that compensation is determined by a jury into a wholly independent sentence. The Court does not conclude that the amendment was an idle act, and Article I, § 16 of the North Dakota Constitution now clearly requires compensation for taking private property to be determined by a jury, unless that is waived: “Compensation shall be ascertained by a jury, unless a jury be waived.”

[¶23] Other language in Article I, § 16 indicates that even compensation which an owner opts to receive in annual payment form is by “a jury trial, unless a jury be waived . . .” Id. Further, a more recent case, Sauvageau v. Bailey, 2022 ND 86, ¶ 9, 973 N.W.2d 207 (emphasis added), supports this interpretation:

Article I, § 16, N.D. Const., states “[p]rivate property shall not be taken or damaged for public use without just compensation having been first made to, or paid into court for the owner.” **A jury decides the amount of compensation due for the taking, unless a jury is waived.** *Id.* Section 16 also authorizes the state to acquire a right of way by quick take. Quick take allows the state to “take possession upon making an offer to purchase and by depositing the amount of such offer with the clerk of the district court of the county wherein the right of way is located.” *Id.* **The owner of the right of way may have a jury decide the quick take damages.** *Id.* **Quick take offers an owner less protection because the condemnor can take possession of the property before trial on the amount of just compensation due.** *Johnson v. Wells Cty. Water Res. Bd.*, 410 N.W.2d 525, 529 (N.D. 1987).

[¶24] The decision in Sauvageau notes Article I, § 16, N.D. Const. has a timing requirement: “Private property shall not be taken or damaged for public use without just compensation **having been first made** to, or paid into court for the owner, unless the owner chooses to accept annual payments as may be provided by law.” *Id.* While there are actions that allow certain possession before trial, such as “quick take,” no party argued N.D.C.C. Chapter 38-22 involves this.

[¶25] The Court concludes N.D.C.C. Chapter § 38-22, like the law challenged in NWLA I, is “in conflict with the higher law of the state and federal constitutions” and is therefore “unenforceable.” NWLA I, at ¶ 35. Specifically, the Court concludes N.D.C.C. Chapter 38-22 is unconstitutional as it provides for a government-authorized physical invasion of property, which constitutes a taking, and it does not provide for “just” compensation as outlined as Article I, § 16 of the N.D. Constitution.

[¶26] **Correlative Rights.** Defendants argue pore space amalgamation, like oil and gas pooling, is allowed under police powers and the correlative rights doctrine, citing Texaco Inc. v. Indus. Comm’n, 448 N.W.2d 621, n. 1 (N.D. 1989) and Cont’l Res., Inc. v. Farrar Oil Co., 1997 ND 31, ¶¶ 16-17, 559 N.W.2d 841. They argue laws and precedent which allow forced pooling of oil and gas interests in a shared reservoir also justify amalgamation of interests in a shared pore space reservoir. *Index* 184, ¶ 88.

[¶27] The State argues its ability to amalgamate interests in pore space reservoirs, at the behest of the majority of owners, is a valid exercise of the State’s traditional powers to regulate the development of reservoir resources with shared ownership. *Id.* at ¶¶ 78-87, 97. It argues such an ability is necessary for a state that is pioneering the development of laws for regulating carbon capture storage operations. *Id.* The State claims “Pore space reservoirs capable of CO2 storage are remarkably similar to oil and gas reservoirs.” *Id.* at ¶ 115.

[¶28] Defendants repeatedly refer to amalgamating interests, while Plaintiffs argue the statute actually amalgamates a vested property right, pore space. Correlative rights cases cited in Defendants’ briefs in support of summary judgment do mostly involve extraction of oil, though Finite Res., Ltd. V. DTE Methane Res., LLC, 44 F.4th 680 (7th Cir. 2022) involved extraction of coal mine methane gas. *Index* 184, ¶¶ 89-92. In another case relied upon by Defendants, Syverson v. N.D. State Indust. Comm., 111 N.W.2d 128, 133-134 (N.D. 1961), injection of water into a unit reservoir was upheld as “unitization was in the best public interest, was protective of correlative rights, and was reasonably necessary to insure the greatest ultimate recovery [of oil or gas] and to prevent waste [of oil or gas].”

[¶29] Even in the Finite and Syverson cases, extraction of a resource was the essence of the claim. In all the cases cited, references to an owner’s “just and equitable share” referred to preventing waste and ensuring maximum recovery of a landowner’s resource, *i.e.* oil, gas, coal mine methane. Such references did not refer to ensuring maximum use of an owner’s property right, *i.e.* pore space.

The Court concludes this key distinction is critical to the analysis of whether the correlative rights doctrine applies here.

[¶30] The decision in NWLA I clearly held pore space was a vested property right, and the law in this case, N.D.C.C. Chapter 38-22, seeks to pool that vested property right.

[¶31] Unitization to maximize *extraction* of a resource (like oil and gas) on one's land is clearly not the aim here. Instead, the aim is to maximize storage of a resource that may or may not be present on the owner's property (carbon). While this might be possible using other legal avenues (i.e. eminent domain), the Court concludes it is done here in an unconstitutional manner, without just compensation before the government-authorized intrusion resulting in a taking has occurred.

[¶32] In other words, units efficiently use shared natural resources within the unit, while this pore space amalgamation would bring carbon to a unit from where ever it was previously located, forcing non-consenting owners to store in their pore space carbon not native to their land. Once the carbon project is finished, title to that carbon project is then held by the state, depriving the landowner of that property right indefinitely. Finally, the statute allows a government-authorized physical invasion and thus prohibits landowners from excluding others from use of the landowner's property right, without just compensation being determined by a jury, in accordance with our state constitution.

[¶33] There are concerns with application of the correlative rights doctrine to a property right in this manner, as opposed to a resource. The Court sees no distinction preventing application to create units for storage on land of garbage (*i.e.* landfills), nuclear waste, industrial waste, or flood waters, to name only a few. The Court concludes this circles back to exactly why the takings clause exists in the first place, and places the analysis for this case squarely back into Loretto and similar cases.

[¶34] The Court declines to be the first jurisdiction to declare constitutional a leap from unitization of a resource to forced pooling of vested property rights to store a resource which may or may not be present on the owner's property.

[¶35] **Valid Exercise of Police Powers.** Defendants also argue the statute is a valid exercise of police powers. The Court concludes such an argument was made extensively in NWLA I and wholly rejected by the North Dakota Supreme Court at ¶¶ 31-33:

Here, the takings claim is not premised on a regulation of what the surface owners may do with their property, but rather on the State's granting a broad authorization to third parties to physically occupy the surface owners' pore space. This is an exercise of the State's police power that is limited by the takings clause. Property owners necessarily expect their use of property may be regulated through the exercise of a State's police powers, but they

do not take title subject to the possibility that their property can be “actually occupied or taken away” without just compensation. Id. NWLA I, at ¶ 33.

[¶36] This Court concludes this analysis in NWLA I is persuasive and applicable here as well, and N.D.C.C. Chapter 38-22 is not a valid exercise of police powers not subject to the takings clause.

[¶37] **Costs, Disbursements and Attorney’s Fees.** The pleadings sought disbursements, costs and attorney’s fees.

[¶38] This action involves a constitutional challenge raised by Plaintiffs to certain amendments and enactments in state law. This Court has now ruled in Plaintiffs’ favor. Federal statutes 42 U.S.C. §§1983 and 1988 allow an award of attorneys’ fees and expenses if a party prevails in a constitutional challenge to a state statute against state defendants acting in their official capacities. Specifically, 42 U.S.C. § 1983 provides:

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceedings for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer’s judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable.

[¶39] The other statute, 42 U.S.C. § 1988(b), then allows attorney’s fees in any action to enforce a provision of § 1983.

[¶40] Similar to NWLA I, this case involves state actors in their official capacity, and it is not determinative that Plaintiffs did not specifically plead §§ 1983 or 1988. Plaintiffs’ claim was substantively a proceeding to enforce § 1983 within the meaning of § 1988(b), even if not in form. Plaintiffs are prevailing plaintiffs in a meritorious civil rights claim and can recover attorney fees under § 1988(b) even without specifically pleading or arguing § 1983.

[¶41] Plaintiffs are also the prevailing parties entitled to payment of fees and expenses in accordance with N.D.C.C. § 28-26-02, N.D.C.C. § 28-26-06, and N.D.R.Civ.P. 54(e). Plaintiffs shall file and serve verified statements of costs, fees, and disbursements in accordance with N.D.R.Civ.P. 54(e), and this issue will proceed in accordance with Rule 54.

[¶42] Once the issue of disbursements, costs and attorney’s fees has been heard, Plaintiffs shall prepare a judgment.

Conclusion

[¶43] The Court concludes N.D.C.C. Chapter 38-22 is unconstitutional as it provides for a government-authorized physical invasion of property constituting a taking and it does not provide

for “just” compensation as outlined as Article I, § 16 of the N.D. Constitution. Plaintiffs’ motions for summary judgment are GRANTED as to this claim and Defendants’ and Intervenor-Defendants’ motions for summary judgment as to this issue are DENIED.

ORDER

[¶44] Summary judgment is GRANTED in favor of Plaintiffs and summary judgment is DENIED as to Defendants and Intervenor/Defendants. Plaintiffs are the prevailing parties entitled to payment of disbursements, costs and attorney’s fees. Plaintiffs shall file and serve verified statements of costs, fees, and disbursements in accordance with N.D.R.Civ.P. 54(e). Further proceedings in accordance with N.D.R.Civ.P. 54(e) shall occur before a final judgment is issued in this matter. Once a final judgment can be issued, Plaintiffs shall prepare the same.

[¶45] **IT IS SO ORDERED.**

Dated this 2ND day of December, 2025.

BY THE COURT:

A handwritten signature in black ink, appearing to read 'Anthony Swain Benson', written over a horizontal line.

Anthony Swain Benson
District Court Judge

3b. Renewable Fuels Infrastructure Program



IOWA DEPARTMENT OF AGRICULTURE & LAND STEWARDSHIP

Renewable Fuels Infrastructure Program

	April 15 2025 (4 th Qtr of FY 2025)	June 4 2025 (4 th Qtr of FY2025)	July 17 2025 (1 st Qtr of FY2026)	Sept. 16, 2025 (2 nd Qtr of FY2026)	Total Projects FY2025 YTD
Projects					
Ethanol Blenders/E85/E15	94	91	4	44	233 Year to Date
Retail Biodiesel Dispensers	0	0	20	4	24 Year to Date
Retail Biodiesel Blender Dispensers	0	0	0	0	0 Year to Date
Biodiesel Blending Terminals	0	0	0	0	0 Year to Date
TOTAL PROJECTS FY 2025	94	91	24	48	257 Year to Date
FUND BALANCE	18,620,819	17,315,086	24,665,324	23,269,000	

9/16/25 - \$566,000.00 remaining for biodiesel projects

Next RFIP Board Meeting scheduled for December 17, 2026 1pm



PRESS RELEASE

FOR IMMEDIATE RELEASE
September 17, 2025

Press Contact: Hannah Love
515-322-0435

Iowa Expands Access to Biofuels with Renewable Fuels Infrastructure Program

Program Awards 48 Projects \$1.9 Million Statewide

WEST DES MOINES, IA- Iowa's cost-share Renewable Fuels Infrastructure Program (RFIP) recently awarded \$1,864,344 in grants for 48 applicants to add biofuels to retail sites. Four applications aimed to add B11 at select sites, while the remaining forty-four focused on expanding E15 availability at retail locations.

"Following RFIP's latest round of grant awards in July, it is exciting to see even more retailers take advantage of this opportunity to provide biofuels to customers," said IRFA Marketing Director Lisa Coffelt, who sits on the Renewable Fuel Infrastructure Board.

To qualify for the program, biodiesel retailers must use the infrastructure to offer biodiesel blended fuel classified as B11 (11 percent biodiesel) or higher. During colder months, retailers can offer B5. Ethanol retailers can qualify for E15 and higher blends.

To date, the program has granted over \$61 million to help fund ethanol and biodiesel infrastructure across Iowa, allowing retailers to add necessary equipment to their stations to offer higher blends of biofuels. RFIB consists of voting members appointed by the Governor of the State of Iowa.

The Iowa Renewable Fuels Association represents the state's liquid renewable fuels industry and works to foster its growth. Iowa is the nation's leader in renewable fuels production with 42 ethanol refineries capable of producing 4.7 billion gallons annually – including 34 million gallons of annual cellulosic ethanol production capacity – and 10 biodiesel facilities with the capacity to produce 416 million gallons annually. For more information, visit the Iowa Renewable Fuels Association website at: www.iowaRFA.org.

###

3c. E15 Access Standard Implementation

E15 Access Standard Implementation

Waiver Request Status November 24, 2025

<https://iowaagriculture.gov/e15access>

Class 1 Waiver – “Old Tanks”

204 granted by IDALS as of November 24, 2025

Class 2 Waiver – “Cost of Upgrade”

120 waivers granted as of November 24, 2025.

Small Retailer Wavier – “300K or less in annual sales”

332 waivers have been submitted and granted as of November 24, 2025.

Total license retailers in Iowa	2,255
Exempt retailers (marinas & airports)	206
Stations offering E15 today	992
Stations with RFIP grants	112 (some may offer E15 today)
Small retailer exemptions	332
Class 1 waivers	204
Class 2 waivers	120
Safe Harbor applications	103
Stations yet to be categorized	186

Total stations (2255) minus exempt retailers (206) = 2049 retailers to sell E15

Total of 1207 stations will be selling E15 almost 60% of stations across Iowa.

Monthly Fuel Terminal Reports
E15 or Higher Taxable Gallons

January	22,228,444
February	26,479,198
March	22,241,616
April	27,854,905
May	26,269,185
June	29,501,175
July	29,891,865
August	30,135,224
September	33,588,570
October	29,621,972
November	30,000,000
December	30,000,000

Nov. - Dec. numbers assume recent levels continue.
 With many stations coming on-line to meet Jan. 1
 E15 Access Standard deadline, we believe this is conservative.

TOTAL 337,812,154

Annual Retailers Report 482,588,791

ESTIMATE

Based on Terminal Sales
 Capturing 70% of Retail Sales
 (average of last 3 years)

E15 Retailers Tax Credit \$43,432,991.23

ESTIMATE based on sales projection

E100 72,388,319
 Net E100 24,129,440

% of Iowa Sales 32.2%

Based on estimate of 1.5 BG Iowa "gasoline" sales

3d. Primary Project



IOWA CANDIDATE PROGRAM

Announced Candidates for 2026 Primary

Iowa Governor's Race: Republicans

- | | |
|--|--|
| 1. U.S. Rep. Randy Feenstra | endorsed: Sen. Ernst, Rep. Miller-Meeks, Lt. Gov. Cournoyer, IA Treasurer Roby Smith |
| 2. Former state Rep. Brad Sherman | endorsed: State Sens. Alons, Campbell, Carlin, Guth, Salmon; State Reps. Cisneros, Lawler, Osmundson, Stotenberg |
| 3. State Rep. Eddie Andrews | |
| 4. Adam Steen, former director of Iowa DAS | running as MAGA guy and a “faith” guy |
| 5. Zach Lahn, farmer and businessman | running as populist, “anti-monopoly” candidate, endorsed by |

Iowa Governor's Race: Democrats

1. State Auditor Rob Sand
2. Julie Stauch, led Pete Buttigieg Iowa caucus effort

Iowa U.S. Senate Race: Republicans

1. U.S. Rep. Ashley Hinson
2. Former state Sen. Jim Carlin
3. Joshua Smith, former Libertarian candidate for president

Iowa U.S. Senate Race: Democrats

1. State Rep. Josh Turek – endorsed by state Rep. JD Scholten
2. State Sen. Zach Wahls
3. Former state Rep. Bob Krause
4. Nathan Sage, Iraq War veteran and mechanic

Announced Candidates for 2026 Primary

Iowa Congressional Races: First Congressional District

Republicans

1. U.S. Rep. Mariannette Miller-Meeks
2. David Pautsch

Democrats

1. Christina Bohannon
2. Travis Terrell
3. Taylor Wettach

Iowa Congressional Races: Second Congressional District

Republicans

1. State Rep. Shannon Lundgren
2. Former state Rep. Joe Mitchell
3. State Rep. Charlie McClintock

Democrats

1. State Rep. Lindsay James
2. Kathryn Dolter
3. Clint Twedt-Ball

Announced Candidates for 2026 Primary

Iowa Congressional Races: Third Congressional District

Republicans

1. U.S. Rep. Zach Nunn

Democrats

1. IA House Minority Leader Jennifer Konfrst
2. St. Sen. Sarah Trone Garriott
3. Xavier Carrigan

Iowa Congressional Races: Fourth Congressional District (Open)

Republicans

1. St. Rep. Matt Windschitl
2. Chris McGowan
3. Kyle Larsen
4. Ryan Rhodes, affiliated with Iowa Tea Party

Democrats

1. Dave Dawson, former St. Rep.
2. Ashley Wolftornabane
3. Stephanie Steiner

Examples of ‘Ag Country’ Elected Officials

Iowa 4th Congressional District 2024 Primary – Candidate Kevin Virgil:

- Opposes traditional farm bill, calls it ‘welfare and school lunch bill.’
- Opposes RFS, calling it the ‘largest form of ethanol subsidy today.’
- Opposes farmers using pesticides, saying ‘We know now glyphosate, despite lobbyists on Capitol Hill are trying to stop federal government disclosing, are a serious cause for cancer.’
- Opposes GMO corn, saying ‘I think GMO corn has a whole host of problems, not least because of rising cancer rates in Iowa.’
- Endorsed by Steve King, State Rep. Zach Dieken, State Rep. Mark Thompson, State Sen. Lynn Evans, State Sen. Kevin Alons, and State Sen. Rocky DeWitt.

State Legislators Actions During 2025 Session:

Opposed Iowa Pesticide Tort Reform

- GOP Senators that Voted No: Kevin Alons, Doug Campbell, Jeff Taylor, Sandy Salmon, Dave Sires (Lynn Evans/Mark Lofgren absent)

Opposed Use of Margarine in School Lunches

- GOP Chairmen bill, Rep. Skyler Wheeler, passed out of the Education Committee

Opposed Vital CCS Projects

- Too many to list...

Announced Candidates for 2026 Primary

State Legislative Races:

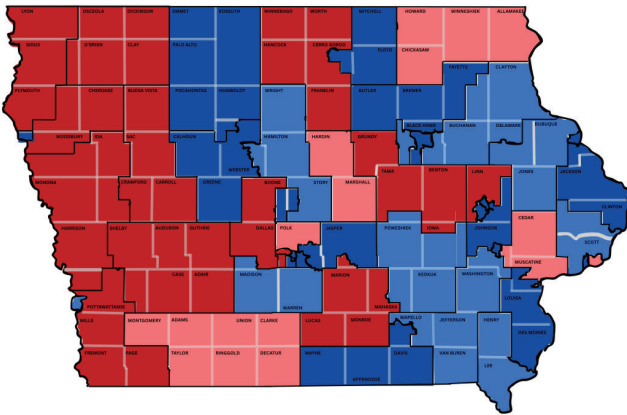
1. Potential for many of Iowa's state legislators with farming background not running for re-election
 - Senate - Tom Shipley, Ken Rozenboom, Dan Zumbach (2028)
 - House – Chad Ingels, Norlin Mommsen, Thomas Moore, David Sieck, Mike Sexton
2. Others already face primaries
 - Senate - Annette Sweeney vs. Rocky Damiano
3. There could be half-a-dozen open primaries in RURAL Iowa Senate districts
4. There could be more than a dozen open primaries in RURAL Iowa House districts
5. Recent history has shown that activists, not farmers and business folk run

Incumbents: There are also a number of Senate and House incumbents in RURAL districts that have not stood up for E15 access, vegetable oils, crop protection products, voluntary and cost-share water projects (nitrates), GMO seeds, and CCS.

So what can we do? We start by not sitting back and letting history repeat itself in RURAL primaries.

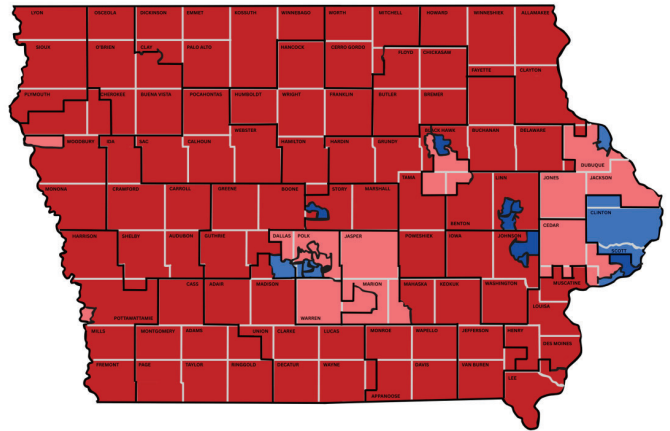
The Changing Political Environment - Iowa Senate 2006 vs 2024

2006 SENATE



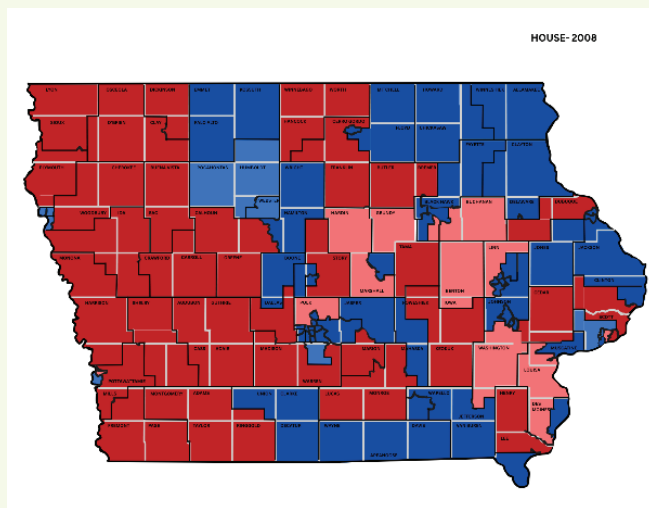
In 2006 the Iowa Senate: 30 **D** & 20 **R**

2024 SENATE

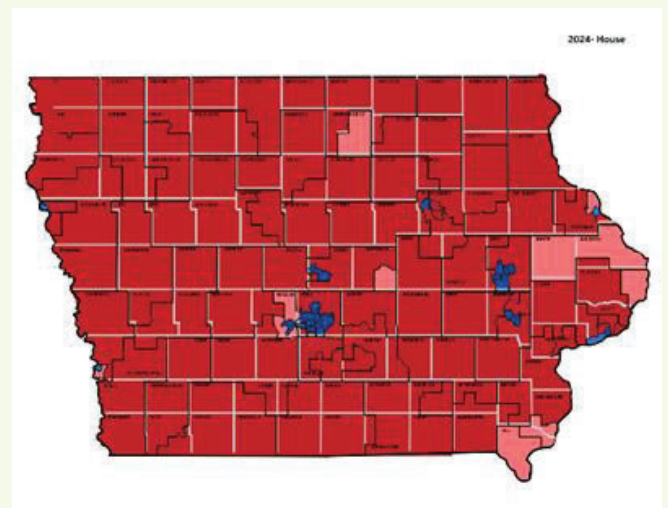


In 2024 the Iowa Senate: 35 **R** & 15 **D**

The Changing Political Environment - Iowa House 2008 vs 2024



In 2008 the Iowa House: 57 **D** & 43 **R**



In 2024 the Iowa House : 67 **R** & 33 **D**

What Now? How can I support?

Coalition Building - Big tent, need all hands-on deck

- A. Ag Trade Associations, Private Businesses & Others
- B. Entities can join in where they feel comfortable

Tier One: Create a Pro-Agriculture Bench

- a) Names of potential candidates in all RURAL House and Senate districts
- b) When seats open and/or there is a need for a pro-ag candidate, we can quickly activate someone the seat
- c) **Needs:** Effort from various grassroots organizations. Funding to hire a coordinator.

Tier Two: Support a Pro-Agriculture Candidate in Primary (open seat)

- a) Endorse, fund, activate grassroots.
- b) **Needs:** Activation of entities own resources. Funds for Third Party Super PAC.

Tier Three: Support a Pro-Agriculture Challenger to Anti-Ag Incumbent

- a) Endorse, fund, activate grassroots.
- b) **Needs:** Activation of entities own resources. Funds for Third Party Super PAC.

3e. CO2 Projects



PRESS RELEASE

FOR IMMEDIATE RELEASE

October 8, 2025

Press Contact: Hannah Love

515-322-0435

With Tallgrass Carbon Sequestration Pipeline Operational, Iowa Loses “Crown” as Best Place to Produce Corn Ethanol

Iowa Missing Out on Over \$3 Billion in Value Each Year

WEST DES MOINES, IA – With the [commencement of CO2 shipments on the Tallgrass Trailblazer pipeline](#) last week, which carries CO2 from several plants located in Nebraska to a sequestration site in Wyoming, Iowa has officially lost its “crown” as the best place in the world to produce corn ethanol. Ethanol plants able to capture and sequester CO2 can reduce their carbon intensity (CI) by up to 33 points, thereby qualifying for up to 66 cents per gallon under the federal tax credit program known as 45Z.

“Congratulations to Tallgrass for this monumental achievement,” stated Iowa Renewable Fuels Association Executive Director Monte Shaw. “Huge new markets around the world are demanding ultra-low carbon ethanol and carbon capture and sequestration (CCS) is the best tool to get there. The plants on the Tallgrass pipeline now have a leg up in many ways. IRFA will be working hard to ensure Iowa plants have access to the tools they need to compete.”

Iowa has been the most profitable place in the world to produce corn ethanol since 2000. As such, the industry expanded in the state to become the largest ethanol producer and many affiliated industries made investments in facilities and operations in Iowa. [Last year, ethanol production in Iowa added nearly \\$5.2 billion to the state GDP, increased household income by \\$2.5 billion, and supported almost 33,000 jobs.](#)

“For the first time since 2000, Iowa is no longer the best place to produce corn ethanol,” stated Shaw. “Alarm bells should be going off with any leader who values Iowa’s rural economy. We need to work to ensure this is temporary, not permanent. The huge economy-wide benefits that reverberate out from ethanol production in Iowa are not a given. If Iowa does not remain competitive, those investments will flow to areas that are competitive.”

If Iowa's 4.7 billion gallons of annual ethanol production all had access to CCS, it could generate over \$3 billion of additional value for Iowa through 45Z tax credits, recently extended by President Trump.

"Iowa needs to step up and get behind President Trump's American energy dominance vision," stated Shaw. "The [Trump administration has prioritized extending clean fuel credits](#) for American renewable fuels. Further, Trump has [championed CCS](#) as a vital tool to push America forward. As farmers face the [fear of another farm crisis](#) and ag industries continue to face economic challenges, now is the time to push CCS forward, not to stick our head in the sand."

The Iowa Renewable Fuels Association represents the state's liquid renewable fuels industry and works to foster its growth. Iowa is the nation's leader in renewable fuels production with 42 ethanol refineries capable of producing 4.7 billion gallons annually – including 34 million gallons of annual cellulosic ethanol production capacity – and 10 biodiesel facilities with the capacity to produce 416 million gallons annually. For more information, visit the Iowa Renewable Fuels Association website at: www.iowaRFA.org.

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4a. RFS2



October 31, 2025

U.S. Environmental Protection Agency
EPA Docket Center, Office of Air and Radiation Docket
Mail Code 28221T
1200 Pennsylvania Ave NW
Washington, DC 20460
Docket ID No. EPA-HQ-OAR-2024-0505

Via: www.regulations.gov

RE: Renewable Fuel Standard Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes; Supplemental Notice of Proposed Rulemaking

Dear Administrator Lee Zeldin:

Iowa Renewable Fuels Association (IRFA) welcomes the chance to provide comments regarding the proposed rule to account for refinery exemptions (SREs) from 2023-2025 while setting Renewable Fuel Standard (RFS) blending levels for 2026 and 2027. IRFA is an independent trade association whose members have the capacity to produce over 6.5 billion gallons of corn-starch ethanol, cellulosic ethanol, biodiesel, renewable diesel, renewable natural gas (RNG), and sustainable aviation fuel (SAF) across the United States. Given the diversity of our membership in the number of bioproducts produced, in size (from small, locally-owned co-ops to large multinational corporations), in feedstock use (corn, corn stover, distillers corn oil, corn kernel fiber, soybean oil, canola oil, various fats and greases, and used cooking oil), combined with the scope of our members, IRFA is uniquely suited to provide input on this important topic.

Maintain and Finalize the Robust Blending Level (RVO) Proposal for 2026-2027

Before moving to the supplemental topic at hand, IRFA would be remiss not to acknowledge the robust blending levels originally proposed for 2026-2027. We thank the Agency for the Set 2 proposal that, if finalized, would fulfill the mission given by Congress via the RFS to the Agency – expand the use of renewable fuel in the United States to enhance energy security and to reduce harmful emissions.

As we noted in comments on the Set 2 proposed rule, President Trump challenged refiners and renewable fuels producers to deliver a unified RFS blending level request, something unthinkable only a few years ago. Despite differences in the past, common ground was reached, and a joint request was submitted to the EPA.¹ The EPA's June 17th proposed blending levels closely mirrored the recommendation of the united liquid fuels industry. *IRFA strongly supports and urges the EPA to adopt the proposed RFS blending levels in the final rule.*

SREs Should Be Few and Fully Reallocated

In our August 8th comments, IRFA thanked EPA for committing in the Set 2 proposed rule that it “proposes to project the exempt volume of gasoline and diesel associated with SREs for the 2026 and 2027 compliance years”² and to incorporate that projection into the final RFS blending percentage calculations. *IRFA fully supports this approach.*

We hope the Agency has forgiven us for ignoring your admonition that comments on pending SREs were “beyond the scope”³ of the Set 2 proposed rule. IRFA noted that dozens of pending SREs⁴ representing billions of gallons of blending from over a decade was the 800-pound elephant in the corner of the room. We urged the EPA to maintain a high standard of proof for SRE approvals. As noted then, *IRFA still strongly believes that the best way for the EPA to maintain the integrity of the RFS, to provide market certainty, and to ensure farmers, renewable fuels producers, and obligated parties are treated fairly is to ensure the granted SREs are few and fully reallocated.*

SRE Tricks Should Not be Rewarded with Treats

IRFA feels confident that the Agency will not be surprised that we take note of the date these comments are submitted: October 31st, otherwise known as Halloween. In the spirit of the season, IRFA asks the EPA to vigorously investigate the shocking matter recently brought to its attention by three state Attorneys General.⁵

Iowa's Attorney General Brenna Bird, along with the Attorneys General of South Dakota and Nebraska, noted that of the 140 full or partial RFS refinery exemptions the EPA granted in 2025, several of these refiners are communicating to shareholders and the U.S. Securities and Exchange Commission (SEC) that they are “economically thriving.”⁶

¹ <https://www.api.org/-/media/files/news/letters-comments/2025/multi-trade-rfs-letter-to-zeldin.pdf>

² Federal Register, Volume 90, Number 115, page 25833.

³ Ibid.

⁴ <https://ethanolproducer.com/articles/zeldin-epa-working-to-clear-backlog-of-sre-petitions>

⁵ https://www.iowaattorneygeneral.gov/media/cms/10_0B61A5FF05AC8.pdf

⁶ Ibid.

The Attorneys General stated: “These statements made in public to financial regulators and investors appear to be inconsistent with what must be contemporaneous statements of disproportionate hardship to environmental regulators. Both strong economic results and disproportionate economic hardships cannot coexist. And to use the statute’s own relative terms: Refiners cannot both outperform and out maneuver their peers yet also be *disproportionately* economically harmed.”⁷ *IRFA strongly echoes the Attorneys General request that EPA not reward these potential tricks with SRE treats, and for EPA to engage with the SEC and all relevant federal agencies to ensure no refiner is misleading either the Agency or public shareholders.*

In a time when crop prices are low and increased renewable fuels usage is a key solution, it is deeply troubling to see what appears to be an attempt by some oil refiners to game the system and avoid their legal requirements under the RFS. EPA must get to the bottom of this immediately.

From these refinery statements, an ordinary person could reasonably interpret that the SRE process is being manipulated to create windfall profits, not relief from disproportionate economic harm. That is why the IRFA disagreed with the number of SREs granted back in August and continues to believe that the value of RFS credits, known as RINs, is passed through in the prices of refined products. Economic harm to refiners from the RFS simply does not exist – and SRE recipients are apparently confirming that for all the world to see. Had EPA strictly enforced the legal criteria for granting SREs, there would have been very few, if any, and the central matter of this supplemental notice would be much easier to dispatch with.

EPA Must Fully Reallocate 2023-2025 RFS Exemptions to Prevent Demand Destruction

Yet, those SRE approvals impacted tens of billions of gallons of gasoline and diesel from 2016 to 2025 and billions of RINs. IRFA wants to commend the EPA for its decision to return RINs to refiners based on the year the SRE impacted. This decision essentially negated the negative impact of SREs granted for 2016 to 2022 and is consistent with previous Agency actions providing refiners with an “alternative compliance schedule” when the situation was essentially reversed.⁸

IRFA further appreciates that the delays and backlogs of many of the SREs were due to court proceedings and not the fault of this EPA. Finally, IRFA appreciates that the Agency proposes to (100% or 50%) reallocate the 2023-2025 SRE volumes.

⁷ https://www.iowaattorneygeneral.gov/media/cms/10_0B61A5FF05AC8.pdf

⁸ <https://www.epa.gov/renewable-fuel-standard/final-alternative-rin-retirement-schedule-small-refineries>

However, IRFA would be negligent if we did not address that the Agency proactively noted that in addition to its co-proposed reallocation plan “the EPA is taking comment on SRE reallocation volumes equal to other amounts..., as well as not accounting for any exempted 2023–2025 RVOs (i.e., no SRE reallocation volumes).”⁹

No ghost nor goblin that knocks on our door this Halloween evening will strike fear into our heart worse than contemplating the dire economic impact dumping 2.18 billion un-reallocated RINs into the market would have on renewable fuels demand, farm commodity prices, and the already fragile rural economy. *Therefore, IRFA strongly opposes any suggestions to forgo reallocation of the 2023-2025 SREs.*

The Agency is duty-bound by statute to ensure that the finalized RFS volumes are met. In the supplemental proposed rule, the Agency notes that: “The availability of these [2023-2025 SRE] RINs – and the ability for obligated parties to use them to comply with their RFS obligations in lieu of RINs generated for renewable fuel produced and used in 2026 and 2027 – **could** reduce RIN demand and RIN prices in future years and **may** ultimately result in the market failing to produce the volume of renewable fuel anticipated by the volume requirements in the Set 2 proposal.”¹⁰ (emphasis added)

IRFA heartily endorses the statement above with two exceptions. With 20 years of RFS experience to draw on, the Agency knows that, first, “could” should be “will” and, secondly, “may” should be “shall.” With those edits, the Agency has hit the nail on the head.

It is important to note that in the underlying Set 2 RFS proposed rule, the Agency “projected that the proposed volumes could be met with renewable fuel produced and used in 2026 and 2027.”¹¹ This means no carryover RINs from prior years would be needed for compliance, nor would any refiner be forced to carry forward a compliance deficit – although these two tools of flexibility remain open to them as an option. Therefore, every RIN returned for the recently granted 2023-2025 SREs represents a compliance option to be used in lieu of physical gallons of renewable fuel.

The Agency correctly stated that “failure to mitigate the market impacts of the increased number of carryover RINs due to the 2023–2025 SREs could result in a decrease in demand for renewable fuel produced in 2026 and 2027. This magnitude of carryover RINs has the potential to depress RIN prices due to a significant oversupply of RINs.”¹²

⁹ Federal Register, Volume 90, Number 179, page 45009.

¹⁰ Federal Register, Volume 90, Number 179, page 45010.

¹¹ Federal Register, Volume 90, Number 179, page 45009.

¹² Federal Register, Volume 90, Number 179, page 45010.

With the proposed 2026-2027 RFS volumes balanced to match the Agency's projections of actual production and use of renewable fuels in those years, there is no other plausible conclusion than the one stated above by the Agency.

The Agency sought to establish balance for 2026-2027 between realistic renewable fuels production and use, and the refiners' obligation. With "2.18 billion RINs"¹³ of SREs now either granted or expected by the Agency, this delicate balance would be thrown off by failing to reallocate 100% of the 2023-2025 SREs. The only way to maintain balance and fairness within the RFS program is to match the 2.18 billion **zombie** RINs with corresponding new "SRE reallocation volumes" as the Agency has proposed in Table IV-3 under the "100% Reallocation" columns.¹⁴ *IRFA urges the Agency to finalize the 2026-2027 RFS blending rule with the robust standard volumes as previously proposed combined with additional SRE reallocation volumes designed to account for 100% of the 2023-2025 SREs.*

A 100% reallocation is in accordance with how the Agency proposes to address future SREs, noting: "In the future, we intend to continue our policy of prospectively accounting for exempted volumes of gasoline and diesel such that there will be no need to include SRE reallocation volumes in this manner again."¹⁵

In addition, IRFA is certain that, if discussed with a person in blue tights and a large S on their chest walking down our street this evening holding a bag full of candy, Superman would agree that 100% reallocation best represents: "Truth, justice, and the American way."¹⁶

50% Reallocation Simply Does Not Make Logical Sense; Not Justified

Throughout the supplemental proposed rule, the EPA makes cogent, logical, fact-based arguments to support its co-proposal of 100% reallocation. As IRFA scoured the supplemental notice for similar justification for the co-proposed 50% reallocation suggestion, we simply couldn't find any compelling evidence or argument.

RIN flexibility claim undermined by EPA's own analysis of proposed 2026-2027 RVOs

While noting: "The continued success of the RFS program depends on the RIN market,"¹⁷¹⁸ the Agency tries to argue that given "the limited number of carryover RINs

¹³ Federal Register, Volume 90, Number 179, page 45009.

¹⁴ Federal Register, Volume 90, Number 179, page 45013.

¹⁵ Ibid.

¹⁶ <https://www.dc.com/blog/2025/07/09/when-did-superman-get-his-original-american-way-motto>

¹⁷ Federal Register, Volume 90, Number 179, page 45010.

¹⁸ IRFA must note here that we've always thought the continued success of the RFS depended on increasing the production and use of renewable fuels.

available, it may not be necessary or appropriate to propose SRE reallocation volumes for 2026 and 2027 equal to the full magnitude of the 2023–2025 exemptions to maintain the intended renewable fuel use in 2026 and 2027.”¹⁹

That “logic” is about as hard-headed as what fills Charlie Brown’s trick-or-treat bag.²⁰

Consider the following.

1. First, remember that the Agency proposed RFS volumes for 2026-2027 that could be met with RINs generated from renewable fuel production and use in those years alone. No carryover RINs are needed.
2. Obligated parties have built-in flexibility in meeting any specific year’s requirements by blending renewable fuel, buying RINs from those who do, carrying forward excess RINs from prior years (up to 20% of an obligation) or carrying forward an obligation to the following year (up to 100% of an obligation).
3. If an obligated party wanted to have carryforward RINs, they could have planned to do so. Nearly 40% of the United States fuel market allows year-round blending of E15, yet there is little outside the Midwest. Where offered, retailers report robust E15 sales as consumers can save 10-20 cents per gallon.²¹ The sales of E15 are limited by consumer access. Increasing consumer access to E15 is something refiners can do if they choose. If they choose not to, then they obviously don’t want/need the carryforward RINs that would be generated. In fact, a large refiner association recently reversed its support for nationwide, year-round E15,²² which would unlock not only billions of new RINs, but would be a major boost to the struggling farm economy.²³ It is hard for a reasonable person to feel sympathy for the lack of carryforward RINs when the same people who claim to need them actively work to block the easiest way to generate additional RINs.²⁴ Additionally, much of the diesel fuel sold in the United States is not blended with biodiesel or renewable diesel despite a lack of regulatory or infrastructure barriers.

¹⁹ Federal Register, Volume 90, Number 179, page 45011.

²⁰https://peanuts.fandom.com/wiki/%22I_got_a_rock%22#:~:text=The%20idea%20for%20Charlie%20Brown,a%20rock%20instead%20of%20candy.

²¹ <https://ethanolrfa.org/media-and-news/category/blog/article/2025/04/e15-sales-set-a-new-record-in-2024-and-there-s-reason-for-optimism-about-the-future>

²² <https://www.reuters.com/sustainability/climate-energy/api-reverses-course-e15-gasoline-bill-calls-regulatory-fixes-2025-10-21/>

²³ <https://www.ncga.com/stay-informed/media/in-the-news/article/2025/09/new-study-unrestricted-sales-of-e15-would-fuel-the-economy>

²⁴ <https://www.dtnpf.com/agriculture/web/ag/blogs/ethanol-blog/blog-post/2025/07/29/head-american-fuel-chemical-e15>

4. The 2023-2025 SREs have **already** (or will soon) given rebirth to 2.18 billion zombie RINs that are not accounted for in **any** finalized RFS blending rule. They were never counted on to meet the 2023-2025 RFS rule, nor were they counted on in the proposed 2026-2027 RFS rule. *IRFA feels strongly that to suggest – after RFS rules have been proposed – that some of the zombie RINs are needed for RIN flexibility is illogical and would be detrimental to farmers while providing a windfall to refiners.*

Holding RINs does not alleviate eventual demand destruction

In another attempt, the Agency states: “Obligated parties with carryover RINs can **choose** to hold these RINs for use in future years or use them towards their compliance obligations. Obligated parties holding few or no carryover RINs may have an incentive to hold any carryover RINs attributable to 2023–2025 SREs as a compliance flexibility for future years rather than using them towards their 2026 or 2027 compliance obligations. If obligated parties hold, rather than use, these carryover RINs, we expect a much smaller impact, and potentially even no impact, on the RIN and renewable fuel markets.²⁵ (emphasis added)

Trying to wrap your head around this “logic” is a good reminder to come up for air when bobbing for apples at the neighborhood Halloween party – otherwise you might get a bit dizzy.

First, if obligated parties can CHOOSE to not use their zombie SRE RINs for compliance during 2026-2027, then they obviously didn’t need those RINs for compliance with the pending rule. So, a 100% reallocation is both justified and workable. (Yes, it is just that simple.)

Second, to suggest that if the zombie SRE RINs are not used in 2026-2027, but are held for “future years” compliance equates to “no impact” on renewable fuel markets is preposterous. The Agency is simultaneously suggesting that using the zombie RINs in 2026-2027 leads to renewable fuel demand destruction, but that using the zombie RINs in future years **instead of blending renewable fuels** is fine because there won’t be demand destruction in 2026-2027... ignoring that the demand destruction will occur in future years. Demand destruction is demand destruction, whether in 2026 or 2028.

Matching SREs to SRE Reallocation Volume does not increase consumer costs

Not giving up, the Agency goes on to claim that “uncertainty remains regarding the amount of reallocation necessary to maintain the production of proposed volumes”²⁶

²⁵ Federal Register, Volume 90, Number 179, page 45011.

²⁶ Federal Register, Volume 90, Number 179, page 45014.

because of an alleged “impact on the cost to consumers of transportation fuel and the cost to transport goods.”²⁷

This sounds pretty spooky, like the Wicked Witch of the West just knocked on your door and asked to take a look in your fridge. But how would reallocating the SREs lead to higher fuel costs?

According to the EPA: “The proposed SRE reallocation volumes would result in higher percentage standards for obligated parties than would otherwise be the case, and which in turn require obligated parties to acquire greater quantities of RINs to retire for compliance. We project that, in aggregate, obligated parties would acquire these additional RINs **by purchasing carryover RINs** from other parties rather than blending additional quantities of renewable fuel... We do, however, expect that, on average at the national level, obligated parties would **pass on the costs** of purchasing additional RINs to consumers, and that this action could increase the cost of transportation fuel to consumers.”²⁸ (emphasis added)

There is more to unpack in that paragraph than the goodie bag of the Halloween punk who raided the candy bowl left on the front porch of the old lady down the street with a sign that says, “please take only one.”

If the EPA reallocates the 2023-2025 SREs, the overall 2026-2027 RFS blending obligations will be higher than if they don’t reallocate. Ok. Solid ground so far.

The Agency projects that obligated parties won’t blend more renewable fuels. Instead, they will just buy carryforward RINs. Maybe, maybe not. But given that the EPA just dumped 2.18 zombie RINs into the market with the SREs, we’ll agree this is not an unreasonable assumption.

However, let’s stop here and highlight that the Agency is projecting that reallocating the SREs will NOT lead to higher renewable fuels demand because obligated parties will just buy the corresponding SRE zombie RINs. What happened to the concern for the lack of carryforward RINs raised just a few paragraphs ago? If reallocating SREs can be fulfilled with carryforward RINs and not extra blending, then there is no carryforward RIN issue. The Agency cannot have it both ways.

But back to the higher cost rationale. The Agency is saying the refiners will pass along the cost of acquiring these extra RINs to consumers. If that were true (which it is) then there would not have been the justification of granting the SREs in the first place because the refiners getting the SREs should have passed along the cost when they bought their RINs back in 2023-2025.

²⁷ Federal Register, Volume 90, Number 179, page 45015.

²⁸ Ibid.

Also, this logic violates basic accounting principles. It looks solely at the refiner BUYING the RIN, but not at the refiner SELLING the RIN. In reality, for each debit there is a credit. Therefore, if the market is functioning as the EPA suggests, both the costs and profits of the RIN transaction should be passed through to the consumer, and they would cancel each other out “on average at the national level.” So, there is no net increased cost of transportation fuel to consumers.

If by some perversion of the free market, only the costs were getting passed along (by the obligated party who needed more RINs as they didn’t get an SRE) but the profits of selling the zombie RINs are being hoarded (by the refiner who had the zombie RIN because they got an SRE) then it proves that the SRE was just a windfall profit for the SRE recipient and those refiners were not suffering disproportionate economic harm and, therefore, should never have been given the SRE in the first place.

In short, when considering the full economic ramifications of the additional RIN transactions likely caused by reallocation, the Agency cannot logically claim an increase in consumer costs unless it wants to also admit it erred in granting the SREs to begin with.

Only 100% reallocation matches facts, logic

On one side you have a clear fact pattern, borne out by 20 years of experience with the RFS, logical, and reasonable. When you read the portions of the supplemental proposed rule that support the proposal to reallocate 100% of the 2023-2025 SREs you can nod your head along to the logic, just like listening to the Monster Mash.²⁹

Conversely, when you read the portions of the supplemental proposed rule that attempts to provide a rationale for doing less than 100% reallocation, it leaves your head feeling like you had way too much Witches Brew at the office Halloween party... a bit dazed and confused. The facts are incomplete, the logic doesn’t make sense in the real world, and one supposed rationale undercuts another supposed rationale.

The EPA proposed 2026-2027 RFS blending levels were based on the amount of renewable fuel projected to be produced and used during those years. By granting SREs that were not accounted for in previous RFS rules, the EPA will undermine the RFS, destroy renewable fuels demand, and hurt the rural economy unless there is 100% reallocation. The EPA was proper to propose and should finalize 100% reallocation.

²⁹ <https://www.youtube.com/watch?v=tsPdVsIXqzU>

Reallocation Over Two Years is Appropriate, but 100% Reallocation is Paramount

In the supplemental proposed rule, the EPA plans “to divide the exempt volume across two years to lessen the disruption to the market and the burden on obligated parties.”³⁰

While IRFA will not object to this plan, it should be discussed. What are the facts?

1. 2023 and 2024 SREs have already been granted. Those zombie RINs are already in the marketplace for use in complying with any open or future compliance year.
2. 2025 SREs can be submitted shortly, and EPA has indicated the Agency will “issue decisions on SRE petitions for the 2025 compliance year” in the next few months.³¹
3. For the three years combined, that is 2.18 billion RINs³² already (or soon) in the marketplace.
4. EPA proposes to finalize an SRE reallocation volume to keep the program in balance that would be split between 2026 and 2027.

Throughout these comments, IRFA has stressed why the SRE reallocation volume should and can account for all 2023-2025 SREs. Considering that all 2023-2025 zombie RINs will be in the marketplace long before the compliance deadline for 2026, it would be most appropriate to add the reallocation volumes to 2026. As noted earlier, EPA’s proposed RFS Set 2 blending volumes for 2026 and 2027 stand on their own, based on the projected renewable fuel volumes produced and used in those years. 100% of the zombie RINs will be available in 2026, so it is only logical that to balance the RFS, 100% of the reallocation occurs in the same year.

While IRFA believes this approach is logical and reasonable, we will not oppose the two-year plan proposed by the Agency intended to “lessen the disruption” of the reallocation. However, the Agency should not ignore or minimize the disruption that has already occurred when they granted 2023-2025 SREs and gave birth to 2.18 billion zombie RINs that are, in most cases, already in the market.

There is one final point on the timing of reallocation that IRFA wishes to make. Even though EPA’s own proposed rule clearly supports 100% reallocation, and IRFA could not agree more strongly, we are distressed by persistent rumors that a 50% reallocation is being favored. As illogical and unsupportable as it would be, *if EPA ultimately*

³⁰ Federal Register, Volume 90, Number 179, page 45010.

³¹ Federal Register, Volume 90, Number 179, page 45009.

³² Ibid.

determines that 100% reallocation over 2026-2027 is not possible, the agency should not undermine the RFS with 50% reallocation. Instead, in that scenario, IRFA urges the EPA to reallocate 100% of the 2023-2025 exemptions over four years.

This approach would have the same market impact in 2026-2027 as 50% reallocation but would still provide lasting support for American farmers and the biofuels industry. When dealing with the impacts of long delayed actions, often resulting from court cases, there is precedent for EPA to spread the solution of a multi-year problem over multiple years and rules. For example, this was done when EPA added a supplemental standard to the 2022 and 2023 RFS rules to account for the “2016 remand gallons” following a DC Circuit Court of Appeals decision.³³

To be clear, the facts presented by EPA in the supplemental proposed rule actually support reallocating the 2023-2025 SREs into the 2026 compliance year alone as the zombie RINs will be in the marketplace well before the compliance deadline. Out of an abundance of caution, IRFA will support the two-year reallocation as proposed by EPA. Yet, in the final analysis, demand destruction at any time is still demand destruction. Therefore, if despite its own record of facts, the EPA ultimately believes that reallocating 100% of the 2023-2025 SREs over 2026-2027 is still not advisable, then the Agency must prioritize maintaining the integrity of the RFS and, rather than sanctioning demand destruction, should spread the reallocation over two RFS rules. IRFA believes that while this delay in restoring balance to the RFS is unnecessary, it would be preferable to outright demand destruction.

EPA Actions Showing Impact on E15

Much of the analysis around the proposed 2026-2027 RFS blending level rule and this supplemental SRE reallocation rule hinges on how much renewable fuel can reasonably be expected to be produced and used during the given years.

Recent data from Iowa should be encouraging for the EPA. The state gathers data from fuel terminals on a monthly basis, and because a meaningful portion of blending occurs after fuel leaves the terminal, the state also collects data from retailers once a year.

In February of 2024, EPA granted a petition by 8 Midwestern states for a fuel regulatory change that essentially allowed E15 to be sold in those states throughout the year.³⁴ Various parties petitioned the EPA to delay implementation of the rule, and in February of 2025, EPA announced it would uphold the original implementation date of April 28, 2025.³⁵ The impact of this clarity has been quick and powerful.

³³ <https://www.epa.gov/system/files/documents/2022-12/rfs-set-rule-nprm-2022-11-30.pdf> (page 10)

³⁴ <https://www.chsinc.com/news-and-stories/2024/04/04/e15-availability-update>

³⁵ <https://www.epa.gov/newsreleases/ahead-summer-driving-season-epa-allows-expanded-e15-access-midwest-states-year-round>

Just yesterday, the Iowa Department of Revenue released the Fuel Tax Monthly Report for September 2025.³⁶ The report revealed a new monthly record for E15 sales at the terminal level of over 33 million gallons. Attachment A details the E15 sales reported by Iowa terminals from 2022 through September of this year.

It is important to note that since EPA confirmed year-round E15 access in Iowa, the sales numbers have increased dramatically. There has been a marked response to EPA's February action to institute the E15 rule. Every month since March of 2025 has set a new E15 sales record.

The attachment also lists the E15 sales reported annually by Iowa retailers.³⁷ This number is higher than the sum of the monthly terminal reports as some blending occurs downstream of the terminal. By estimating the final three months of terminal E15 sales, and applying historical average downstream blending, we can estimate that Iowa E15 sales in 2025 will more than **double** those in 2024, reaching nearly 500 million gallons, or 33% of Iowa's fuel sales. Iowa has shown that when regulations allow consumers the option of E15, they choose it. *IRFA urges EPA to account for the growth in E15 as it evaluates RFS blending levels.*

Unleash the Power of E15

When the EPA, during the first Trump Administration, promulgated rules to allow the nationwide, year-round sale of E15,³⁸ IRFA hailed the move as the most important action since the creation of the RFS. After the courts inexplicably threw out the rule,³⁹ the issue now must be addressed by Congress.⁴⁰ But EPA still has a role to play in unleashing the power of E15.

Outdated regulations often cause fuel retailers to replace perfectly suitable dispensing equipment in order to offer the choice of E15 to their customers. During President Trump's first administration, EPA began work on a rule that would update the regulations to recognize that current fueling infrastructure is compatible with E15. Unfortunately, the Biden EPA shelved that proposed rule before it could be finalized. Regulations already allow year-round sales of E15 in over 40% of the fuel market (reformulated gasoline areas and 8 Midwestern states⁴¹) and Congress is on the cusp

³⁶ <https://revenue.iowa.gov/media/4308/download?inline>

³⁷ <https://revenue.iowa.gov/media/4219/download?inline>

³⁸ <https://www.epa.gov/newsreleases/epa-delivers-president-trumps-promise-allow-year-round-sale-e15-gasoline-and-improve>

³⁹ <https://www.reuters.com/legal/litigation/us-appeals-court-vacates-trump-era-rule-allowing-e15-summer-sales-2021-07-02/>

⁴⁰ <https://www.fischer.senate.gov/public/index.cfm/2025/5/epa-administrator-zeldin-to-fischer-congressional-action-on-year-round-e15-most-durable-and-easiest-solution>

⁴¹ <https://www.epa.gov/newsreleases/ahead-summer-driving-season-epa-allows-expanded-e15-access-midwest-states-year-round>

of enacting year-round E15 nationwide. Iowa Senator Joni Ernst and several colleagues recently sent you a letter urging EPA to resurrect, revise, and finalize the E15 equipment compatibility rule.⁴²

Getting this rule on the road to finalization is even more important now that California, the largest fuel market in the U.S., has removed state restrictions on the sale of E15. Without the need to waste money replacing compatible equipment, California could dramatically increase E15 usage over the next year. *IRFA urges EPA to prioritize this effort.*

Conclusion

Twenty years after its creation, the RFS is still going strong and delivering value for the American motorist, farmer, and taxpayer. By reallocating 100% of the 2023-2025 SREs, EPA can reassert the RFS as a powerful tool for American Energy Dominance for the next twenty years. In doing so, EPA will be fulfilling President Trump's commitment to Iowa farmers back in 2016 to do all in his power to support the RFS.

Of course, reallocating the SREs means nothing without finalizing the robust RFS blending levels proposed by the Agency for 2026-2027. Combining these actions will be like giving the renewable fuels market a full-size candy bar on Halloween and not one of those mini versions.

In a perfect world, farmers don't want tricks (SREs) or treats (bailouts) – they want markets. Renewable fuels provide a growth market for farmers. By getting the RFS back on track with robust, market-moving RFS blend levels and fully reallocating the 2023-2025 SRE zombie RINs, EPA can take the first step to turn around a struggling farm economy while boosting consumer access to lower-cost, home-grown fuels, and taking another step toward American Energy Dominance.

On this and any other issues, IRFA is ready to work with the EPA to provide any further information or background where we may be of assistance. Please do not hesitate to contact me at mshaw@IowaRFA.org or 515-252-6249.

Sincerely,



Monte Shaw
Executive Director
Iowa Renewable Fuels Association

⁴²https://www.ernst.senate.gov/imo/media/doc/letter_to_epa_on_e15_fuel_infrastructure_compatibility.pdf

Attachment A

2025 Iowa E15 Sales

Monthly Fuel Terminal Reports E15 or Higher Taxable Gallons

January	22,228,444
February	26,479,198
March	22,241,616
April	27,854,905
May	26,269,185
June	29,501,175
July	29,891,865
August	30,135,224
September	33,588,570
October	33,588,570
November	33,588,570
December	33,588,570

Oct - Dec. numbers assume
September levels continue.

**TOTAL
Terminal
Sales*** 348,955,892

**Annual
Retailers
Report^** 498,508,417
**Total E15
Sales**

ESTIMATE

Based on Terminal Sales
Capturing 70% of Retail Sales
(average of last 3 years)

E15 % of Iowa
Sales 33.2%

Based on estimate of 1.5 BG
Iowa "gasoline" sales

* <https://revenue.iowa.gov/media/4308/download?inline>
^ <https://revenue.iowa.gov/media/4219/download?inline>

2024 Iowa E15 Sales

Monthly Fuel Terminal Reports E15 or Higher Taxable Gallons

January	8,518,661
February	11,734,092
March	10,431,746
April	9,153,016
May	12,124,157
June	12,700,880
July	14,276,341
August	13,555,340
September	16,850,136
October	15,410,689
November	19,159,861
December	18,172,104
TOTAL Terminal Sales*	162,087,023

Annual Retailers Report^	256,741,594
Total E15 Sales	

% of E15 Sold at Terminal	63.1%
------------------------------	-------

2023 Iowa E15 Sales

January	10,302,587
February	10,901,082
March	5,929,916
April	7,422,917
May	8,895,184
June	10,619,058
July	10,363,282
August	11,173,889

September	9,274,890
October	11,150,130
November	11,860,495
December	11,992,898

Total Terminal Sales*	119,886,328
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Annual Retailers Report	178,529,104
Total E15 Sales	

% of E15 Sold at Terminal	67%
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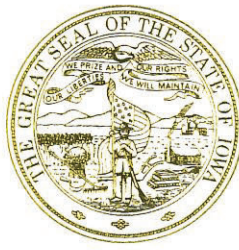
2022 Iowa E15 Sales

January	5,812,536
February	5,700,279
March	6,151,484
April	8,819,622
May	7,252,689
June	8,657,427
July	9,679,386
August	7,229,554
September	8,570,260
October	8,460,672
November	10,637,391
December	9,073,675

Total Terminal Sales*	96,044,975
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Annual Retailers Report	121,130,248
Total E15 Sales	

% of E15 Sold at Terminal	79%
---------------------------	-----



STATE OF IOWA
KIM REYNOLDS
GOVERNOR

October 30, 2025

Administrator Lee Zeldin
Environmental Protection Agency
Office of the Administrator, 1101A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Zeldin,

On behalf of Iowa's farmers and biofuel producers, I write to respectfully ask that the Environmental Protection Agency reallocate one hundred percent of the volumes waived from Small Refinery Exemptions (SRE) granted in full or in part for 2023 and 2024, as well as those projected to be granted for 2025.

Farmers and producers were encouraged by EPA's robust Renewable Volume Obligation (RVO) proposal that was issued in June of this year. The record-setting RVO levels reaffirmed the Trump administration's commitment to our farmers and the Renewable Fuel Standard (RFS). As Governor of the nation's leading state for biofuel production, I appreciate the Administration recognizing the importance of the RFS to not only our farmers and rural communities but also the nation's energy production strategy.

As you now consider the reallocation of SREs from 2023 through 2025, I ask that you account for one hundred percent of the exempted volumes when finalizing the RVO proposal. By reallocating exempted volumes, you uphold the role of the RFS in our nation's liquid fuels industry and provide market certainty to our farmers and biofuel producers. With more than two million gallons of renewable fuels demand pending this decision, I respectfully ask that you continue to support our farmers through the reallocation of exempted volumes.

Thank you again for your work to maintain a strong RFS and for providing much-needed certainty to the agriculture industry.

Sincerely,

A handwritten signature in blue ink, reading "Kim Reynolds", written over a horizontal line.

Kim Reynolds
Governor of Iowa

Congress of the United States

Washington, DC 20515

September 30, 2025

The Honorable Lee M. Zeldin
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Dear Administrator Zeldin,

We thank the Environmental Protection Agency (EPA) for proposing record biomass-based diesel (BBD) volumes in the Set 2 proposal and for including a 50 percent reduction in Renewable Identification Numbers (RINs) for imported renewable fuels and fuels made from foreign feedstocks (Import RIN reduction). The combination of the strong BBD volumes coupled with prioritizing U.S. feedstocks represents a commonsense approach that puts American farmers first, strengthens domestic biofuel markets, and delivers tangible economic benefits to rural communities.

Soybean oil may only represent 20 percent of the bean, but it accounts for more than half of its value in the U.S. market, and about half of that oil is used to make advanced biofuels such as biodiesel, renewable diesel and sustainable aviation fuel. That means roughly a quarter of every bushel's value processed here in the U.S. is directly tied to biofuel demand. At a time when many farmers are struggling to break even, all federal biofuels policies should prioritize domestic agriculture and biofuel production, not foreign fuels made from foreign feedstocks. Additionally, while farmers face the uncertainty of foreign market demand, the Import RIN reduction would provide essential support for the farm economy so farmers could sell more products domestically.

The EPA's own analysis highlights the positive impact of the Import RIN proposal: it will create jobs and generate economic growth in farming, transportation, and manufacturing, particularly in rural communities where oilseed processing facilities are located. This is exactly the outcome Congress intended when it created and expanded the Renewable Fuel Standard.

The Import RIN reduction also aligns with Congressional intent under the 45Z Clean Fuel Production Credit, which prioritizes domestic feedstocks. Aligning EPA's policy with this standard helps level the playing field for domestic feedstock and biofuel producers with imported feedstocks, such as Brazilian tallow and so called "used cooking oil" from China, which would otherwise directly undercut U.S. energy, agriculture, and manufacturing.

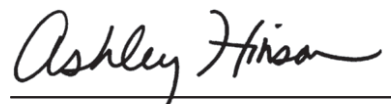
For these reasons, we urge EPA to finalize the Import RIN reduction as proposed and to hold firm on the biomass-based diesel volumes in the rule. Finalizing the proposal would ensure the Renewable Fuel Standard delivers on its promises of strengthening U.S. energy security,

supporting American farmers and domestic renewable fuel producers, and keeping investment and jobs here at home.

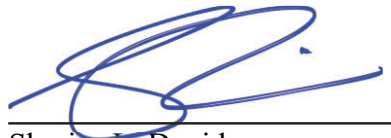
Sincerely,


Charles E. Grassley
United States Senator


Amy Klobuchar
United States Senator

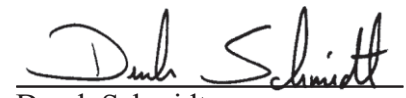

Ashley Hinson
Member of Congress

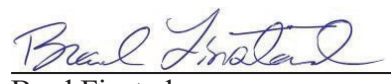

Angie Craig
Member of Congress

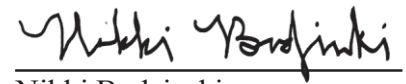

Sharice L. Davids
Member of Congress

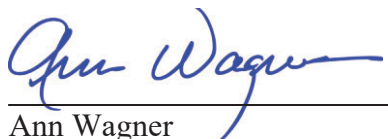

Dusty Johnson
Member of Congress


Roger Marshall, M.D.
United States Senator


Derek Schmidt
Member of Congress


Brad Finstad
Member of Congress


Nikki Budzinski
Member of Congress



Ann Wagner
Member of Congress



Mariannette J. Miller-Meeks,
M.D.

Member of Congress



Don Bacon
Member of Congress



Elissa Slotkin
United States Senator



Tracey Mann
Member of Congress



Emanuel Cleaver, II
Member of Congress



Max L. Miller
Member of Congress



James R. Baird
Member of Congress



Michelle Fischbach
Member of Congress



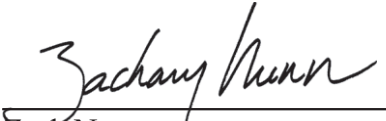
James Comer
Member of Congress

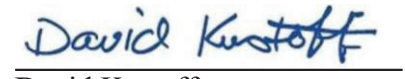


Mike Bost
Member of Congress



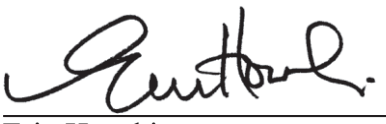
Randy Feenstra
Member of Congress


Zach Nunn
Member of Congress


David Kustoff
Member of Congress

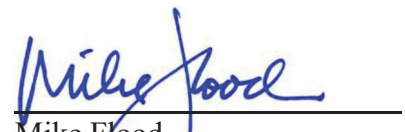

John Rose
Member of Congress


Joni K. Ernst
United States Senator


Erin Houchin
Member of Congress


Mark B. Messmer
Member of Congress


Ron Estes
Member of Congress

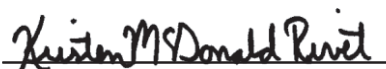

Mike Flood
Member of Congress


Derrick Van Orden
Member of Congress

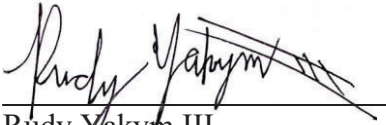

Mark Alford
Member of Congress


Deb Fischer
United States Senator


Todd Young
United States Senator


Kristen McDonald Rivet
Member of Congress


Darin LaHood
Member of Congress



Rudy Yakym III
Member of Congress



Eric Sorensen
Member of Congress



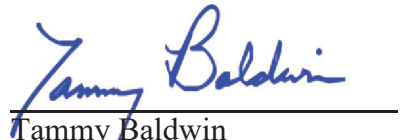
Tina Smith
United States Senator



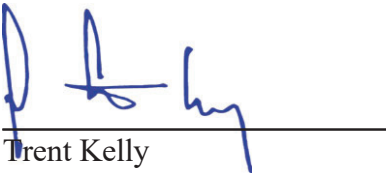
Richard J. Durbin
United States Senator



Pete Ricketts
United States Senator



Tammy Baldwin
United States Senator



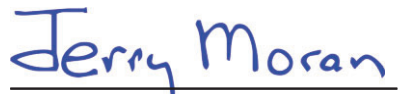
Trent Kelly
Member of Congress



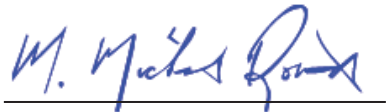
Carol D. Miller
Member of Congress



Adrian Smith
Member of Congress



Jerry Moran
United States Senator



M. Michael Rounds
United States Senator



EPA Must Finalize Robust RFS Volumes for 2026-2027

The Environmental Protection Agency in June proposed a robust step change in Renewable Fuel Standards for biomass-based diesel. While the proposal is a welcome signal to U.S. farmers and biofuel producers, EPA must finalize it quickly and account for all small refinery exemptions to ensure economic benefits.

A Robust Step Change

EPA's recently proposed 2026 and 2027 RFS volumes represent a robust step upward in market space for biodiesel, renewable diesel and SAF when compared to 2025. EPA's proposal acknowledges the industry's investment in new capacity and signals an intent to provide consistent RFS growth.

(billion RINs)	2025	2026*	2027*
BBD	5.36	7.12	7.50
BBD SRE Reallocation		0.22	0.27
BBD Gallons (billion)	3.35	5.61	5.86
BBD % RVO	3.15%	4.53%	4.86%
Advanced	7.33	9.02	9.46
Adv. SRE Reallocation		0.3	0.37
Advanced % RVO	4.31%	5.75%	6.15%

* Based on 100% SRE reallocation and AEO2025.

In September, EPA issued a supplemental proposal to both reallocate 2023–2025 small refinery exemptions and prospectively estimate 2026–2027 exemptions in the final rule. EPA recognized that returning hundreds of millions of RINs to the market through retroactive exemptions and failing to account for future exemptions will reduce demand for renewable fuels in future years.

Meeting America's Energy Needs

With 5.1 billion gallons supplied to the market in 2024, biodiesel and renewable diesel met 9% of total U.S. on-road diesel fuel needs.

EIA's 2025 Annual Energy Outlook projects the available supply of biodiesel, renewable diesel, and other biomass-based fuel will be 5.5 billion gallons in 2026.

Missouri Headquarters
605 Clark Ave.
PO Box 104898
Jefferson City, MO 65110

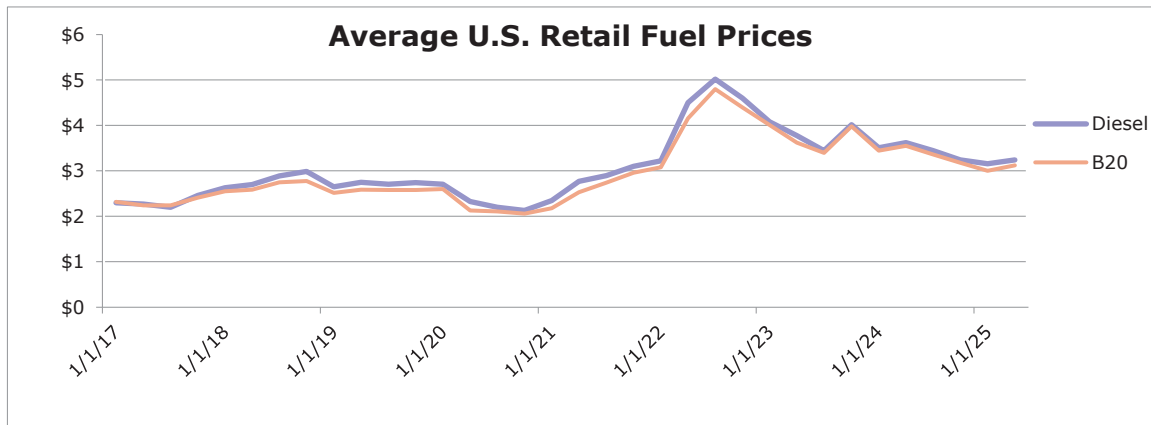
Washington, D.C. Office
1331 Pennsylvania Ave., NW
Suite 505
Washington, D.C. 20004

800.841.5849

888.246.3437

Consumers Will Save at the Pump

Since 2017, B20 biodiesel blends have been \$0.12 per gallon lower on average than petroleum diesel, according to DOE's Clean Cities and Communities.



EPA Must Get the RFS Rules Back on Schedule

By law, EPA is required to finalize RFS rules 14 months before the compliance year. The 2026 RFS volumes were due in November 2024.

Lead time is necessary for farmers and renewable fuel producers to coordinate feedstock production and fuel production.

EPA Must Reallocate All Retroactive Exemptions

EPA must reallocate 100% of the 2023-2025 exemptions to ensure that the volumes it set for those years are met and that returned RINs do not undercut 2026 - 2027 production.

With consistent delays in the annual rules, refiners are due to file 2024 compliance reports in December and 2025 compliance reports next year.

Small Refinery Exemptions Create Uncertainty in the RFS

RFS small refinery exemptions should not add to hardships for farmers or biodiesel and renewable diesel producers. EPA must ensure that annual RFS volumes are met, so the agency must reallocate all retroactive exemptions for 2023-2025 and proactively estimate future exemptions for 2026 and beyond.

EPA Is Granting Small Refinery Exemptions and Refunding Retired RINs

On August 22, EPA cleared a backlog of 191 small refinery exemption petitions dating as far back as 2016 and granted 12 that were denied by the prior administration. On November 7, the agency decided 16 additional petitions filed since August. EPA has not ruled on 12 pending petitions for 2025.

EPA granted or partially granted most exemptions, returning billions of retired RINs to refiners that can be used to reduce outstanding compliance deficits. EPA is not granting refiners credits for future compliance years.

(millions)	2023	2024	2025*	2026*	2027*
Exempt Gallons Gasoline & Diesel	7,660	7,900	5,950	5,950	5,950
Exempt Renewable RINs	930	990	780	1,030	1,150

**projected based on Aug. 12 announcement.*

EPA Must Reallocate Exemptions to Maintain Biofuel Markets

EPA proposes to retrospectively reallocate exempted 2023, 2024 and 2025 volumes. Refunded RINs for these years can be used to lower outstanding 2024 and 2025 obligations.

EPA accurately recognizes that prior-year RINs can be rolled forward and banked to reduce 2026 and 2027 obligations, eroding current and future BBD market space.

EPA also proposes to prospectively estimate small refinery exemptions in the 2026-2027 RVO calculation, using an average of exempted volumes from 2023 - 2025.

Clean Fuels supports this methodology. Granting exemptions in the future – without estimating them in the RVO – would undercut new market space for biomass-based diesel and devastate the industry.

Missouri Headquarters
605 Clark Ave.
PO Box 104898
Jefferson City, MO 65110

800.841.5849

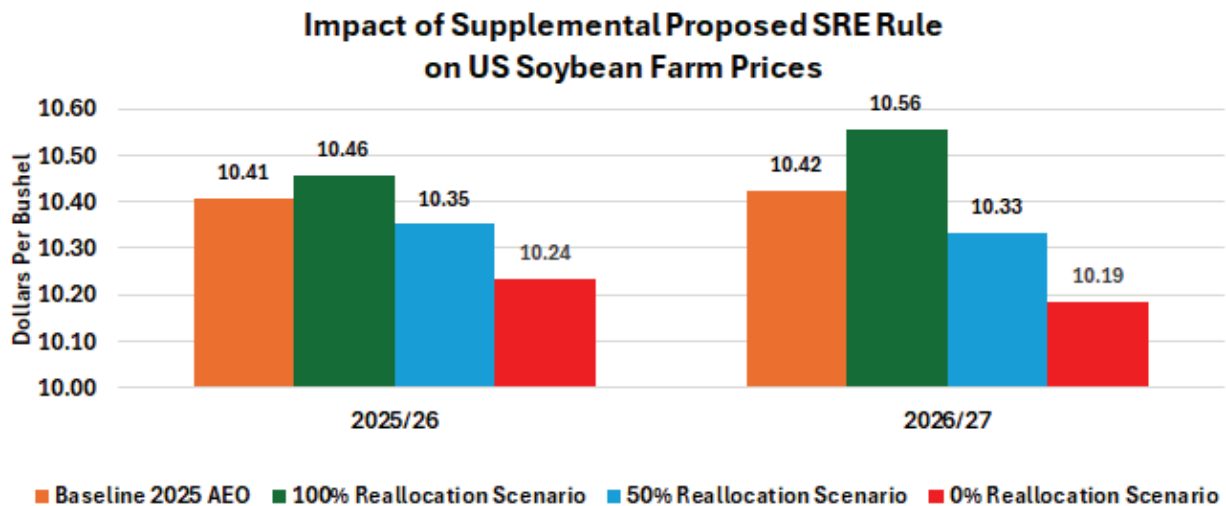
Washington, D.C. Office
1331 Pennsylvania Ave., NW
Suite 505
Washington, D.C. 20004

888.246.3437

Reallocating Exemptions Protects Crop Value

EPA co-proposes increasing 2026 and 2027 RFS volumes by either fully (100%) or partially (50%) reallocating an estimated 2.18 billion RINs exempted for 2023-2025. The agency is also seeking comments on alternative reallocation volumes, including zero (0%).

Results from the WAEES Global Agricultural and Biofuels Partial Equilibrium model show that 50% reallocation and 0% reallocation volumes would reduce biomass-based diesel production in 2026 and 2027 along with demand for soybean oil and the farmgate value of soybeans. Farmers stand to lose as much as 40 cents on every bushel of soybeans if EPA fails to reallocate exempted RFS volumes.



Over 2026 and 2027 market years, farmers could lose \$2.6 billion in crop value if EPA reallocates only 50% and \$6 billion if EPA reallocates 0% exemptions.

		100%	50%	0%
2026	<i>BBD (mil. gal.)</i>	4,949	4,740	4,548
	<i>Soybeans (\$/bu.)</i>	10.46	10.35	10.24
	<i>Soybean oil (¢/lb.)</i>	51.7	49.4	46.5
	<i>Total Soy Value (mil.)</i>	\$32,349	\$31,648	\$30,531
	<i>Relative loss (mil.)</i>		-\$701	-\$1,818
2027	<i>BBD (million gal.)</i>	5,820	5,530	5,210
	<i>Soybeans (\$/bu.)</i>	10.56	10.33	10.19
	<i>Soybean oil (¢/lb.)</i>	64.8	59.2	54.1
	<i>Total Soy Value (mil.)</i>	\$37,905	\$35,987	\$33,836
	<i>Relative loss (mil.)</i>		-\$1,918	-\$4,069

4b. E15

Iowa Renewable



Fuels Association

November 18, 2025

California Air Resources Board (CARB)

Matt Botill

Division Chief, Industrial Strategies Division

1001 I Street

Sacramento, CA 95814

Via: electronic portal

RE: October 14, 2025, Scoping Workshop on E15 Use in California

Dear Mr. Botill:

Iowa Renewable Fuels Association (IRFA) welcomes the chance to provide comments regarding the October 14, 2025, Scoping Workshop on E15 Use in California. IRFA is an independent trade association whose members have the capacity to produce over 5.8 billion gallons of corn-starch ethanol, cellulosic ethanol, biodiesel, renewable diesel, renewable natural gas (RNG), and sustainable aviation fuel (SAF) across the United States. Given the diversity of our membership in the number of bioproducts produced, in size (from small, locally-owned co-ops to large multinational corporations), in feedstock use (corn, corn stover, distillers corn oil, corn kernel fiber, soybean oil, canola oil, various fats and greases, and used cooking oil), combined with the scope of our members, IRFA is uniquely suited to provide input on this important topic.

What is CARB's Goal?

While this was not a topic on which CARB requested input, IRFA starts with this question respectfully and sincerely. We do so because it really drives the context for all of the topics upon which CARB did seek input, and it will, in large measure, drive the ultimate regulatory environment for E15 usage in California.

From our view in flyover country, it has been hard to remain patient as E15 worked its way through CARB's standard multimedia review process. With all the testing complete and a preliminary positive assessment, E15 still awaits final approval by the California Environmental Policy Council. California was the very last state to approve the sale of E15, and it took legislative action to do so.

With AB30 now providing a bridge between where we are today and completion of the multimedia process, the first question that needs answered is whether California wants to seize the authority granted in AB30 to move *quickly* to provide low-cost E15 to the *maximum* number of California motorists under safe and secure conditions already in use for years in other states, or does California want to ignore the lessons learned from other states and pursue an unnecessarily cautious, slow, and expensive path forward?

Given the challenges California faces from local refinery closures to reliance on expensive fuel imports, it is not surprising that AB30 passed with unanimous approval at each and every step of the legislative process. The increasingly high cost of fuel has put a financial strain on motorists across the state. The good news is that E15 represents a clear, quick, and impactful solution for California if the correct regulatory framework is established. Ethanol was the first major factor in reducing greenhouse gas emissions under California's low-carbon fuel standard (LCFS). Now E15 can enhance those benefits while simultaneously providing California consumers relief at the pump. *IRFA agrees with the sentiments of AB30 that CARB should create a safe and secure regulatory pathway for E15 to achieve widespread consumer access.*

Learn From Iowa's Experience

Since its inception in 2002, IRFA has sought to drive the use of ethanol in higher blends. We realized that in a small state like Iowa, our ethanol sales could never "move the needle" of ethanol usage in a major way. Yet our mantra was to prove that higher ethanol blends work and to export those "lessons learned" across the United States. Iowa's long history of E15 sales can provide a proven roadmap for CARB. We have tested the boundaries so that other states can move forward with confidence.

On June 15, 1978, five towns in Iowa became the first to commercially offer "gasohol," known today as E10, to the public in the modern era. By the early 1980s, several stations began to offer E85 as well. Iowa also led the way with blender pumps that offered everything from E0, to E10, to E30, and E85. And today, Iowa leads the nation in both access to and sales of E15.

All of these steps took place in the midst of regulatory uncertainty, so Iowa pioneered regulatory workarounds, balancing the need to "fuel" innovation with the duty to protect motorists and the environment. The good news is that Iowa has done it. *There is no need for California regulators to step into the unknown or to worry about the risk/reward of the various options you are considering. Iowa is happy to share our decade-plus experience with E15 and our decades of experience with ethanol blends of all levels.*

California RFG or Alternative Fuel?

As noted above, we will approach each question from the viewpoint that CARB is seeking a safe and secure regulatory pathway that actually ensures E15 will quickly become widely available to consumers to address both cost and carbon concerns.

From that viewpoint, the answer is clear: *California should update its CaRFG specification to accommodate E15.* This is neither a new concept nor an outlier. The federal government treats E15 as a registered fuel, like gasoline, not an alternative fuel. Every state we are aware of does likewise.

If California treats E15 as CaRFG, it opens the door for quick adoption by retailers and quick acceptance by consumers. E15 could be offered through existing fuel dispensers, and it would appear as a normal choice for consumers.

If, on the other hand, California chose the odd and unprecedented path of treating a registered federal fuel as an alternative fuel, there would be huge, undesirable consequences. Most fuel dispensers would have to be replaced to accommodate a separate hose for E15. This cost alone would set back consumer access to E15 for years. Likewise, it is well-known among Iowa retailers that if you actually want consumers to buy E15, you need to place it alongside the other “standard” fuels like E0 and E10, not segregate it to the other side of the dispenser like E85 (or diesel).

There are ASTM specifications for ethanol and for CARBOB. The properties and performance of blending these two fuels together at the 10% level are well known. But the same is true for E15, given the extensive research and testing done as part of CARB’s multimedia review of E15. Iowa has long regulated ethanol and gasoline as components of the blend:

“3. a. For motor fuel advertised for sale or sold as gasoline by a dealer, the motor fuel must meet requirements for that type of motor fuel and its additives established by the United States environmental protection agency including as provided under 42 U.S.C. §7545.

b. If the motor fuel is advertised for sale or sold as ethanol blended gasoline, the motor fuel must meet departmental standards including as follows:

(1) Ethanol must be an agriculturally derived ethyl alcohol that meets departmental standards based in part or in whole on ASTM international specification D4806 for denatured fuel ethanol for blending with gasoline for use as automotive spark-ignition engine fuel, or a successor ASTM international specification, established by rule.

(2) Gasoline blended with ethanol must meet departmental standards based in part or in whole on ASTM international specification D4814, or a successor ASTM international specification, established by rule.”¹

If the two components meet their respective specifications, then the blend will perform as expected. While Iowa does not use reformulated gasoline (RFG), this remains true for RFG blends as well as conventional gasoline blends.

When considering the benefits of the tried-and-true path, the only conceivable reason to regulate E15 as an alternative fuel is if you want to minimize access and sales. There is no silver lining.

What Infrastructure Upgrades Will Be Needed?

At Terminals

Absolutely no terminal infrastructure upgrades are necessary to accommodate E15 blending in California. Fuel terminals already separately store denatured ethanol and CARBOB. When a tanker truck enters a terminal, it keys in the product it wants to lift and proceeds to the rack to be filled. Today, that product is most often E10, which pulls from the bulk storage tanks to create a 10% ethanol blend in the tanker truck. With E15, all the terminal has to do is reprogram its system to allow the tanker truck driver to choose E15. The same fuels from the same bulk tanks would be blended – with the only difference being the ratio is now 15 to 85 (ethanol to CARBOB) instead of the old 10 to 90 ratio. Every blending rack that can blend E10 should have the physical ability to blend E15 if the computer program is updated to make E15 an option. This is not an assumption or projection. It is experience.^{2 3} *There have been no terminal issues with accommodating E15 in Iowa over the last 13 years.*

Assuming E15's attractive price drives consumer demand, there will be greater ethanol (E100) demand than previously experienced at the terminal level in California. It is possible that some terminals might *CHOOSE* to expand their ethanol storage capacity to expand their days of supply, but this would be a business operation decision – not a requirement. California need only look to its own past to know that when markets move, competitors will also move. When California transitioned from MTBE to ethanol in the early 2000s, many predicted the 2002 deadline could not be met without supply shortages and horrible price spikes. California essentially went from zero to ten percent ethanol blends in two years, and despite the “chicken littles,” there were no negative impacts.

¹ <https://www.legis.iowa.gov/docs/code/214a.2.pdf>

² <https://iowarfa.org/2017/09/magellan-to-offer-e15-at-all-iowa-fuel-terminals/>

³ <https://www.chsinc.com/news-and-stories/2021/08/02/chs-expands-e15-chs>

With well-established supply lines already in place, going from 10 to 15 percent ethanol blends will be much easier. It should also be remembered that in this case, there is no de facto requirement to offer E15. So, ethanol demand will only increase if it makes sense in the supply (ethanol producers, shippers, terminals) and demand (fuel retailers and consumers) markets.

At Retail Stations

The regulatory decisions that CARB and its sister agencies make in this area will have a major impact on E15 access and sales, for better or worse. CARB can (and should) embrace the decade-plus experience of other states to create regulatory guidelines that maximize the ability of retailers to safely offer E15 as an option to their customers knowing the rules will fully protect the environment, the motorists, and retailer employees. If CARB chooses to ignore the real-world experience of Iowa and other states, it could, “out of an abundance of caution,” create a maze of regulations that will chase off access to E15 for years.

Fuel Tanks: E15 should only be stored in tanks that are compatible with the fuel blend. IRFA wants to stress the word *compatible* to differentiate it from the phrase “deemed compatible.” As confirmed by the Steel Tank Institute, everyone knows that steel tanks are compatible with up to 100% ethanol and always have been⁴, regardless of warranty or manufacturers’ marketing materials. Since 1990, the Fiberglass Tank and Pipe Institute has stated the same for all double-walled tanks and most single-walled tanks.⁵

Therefore, especially given California’s strict underground storage tank (UST) protocols, the vast majority of California fuel stations will have no expense regarding tanks and lines when offering E15. That has been the case in Iowa as well.

Our state is in the final two months of instituting an E15 Access Standard, whereby all fuel retailers must either offer E15 as an option to their customers or obtain a waiver from the state.⁶ To prepare for the new law, in 2021, IRFA commissioned a study of Iowa’s UST systems.⁷ A majority of the systems were clearly compatible with E15, while a good number fell into the “unknown” category due to a lack of detailed information in Iowa’s UST database.

⁴ <https://stispfa.org/resource/ethanol-faq/#:~:text=The%20Steel%20Tank%20Institute%20has,all%20tanks%20and%20associated%20equipm ent.>

⁵ <https://www.fiberglasstankandpipe.com/wp-content/uploads/2018/11/Ethanol-Compatibility-with-Fiberglass-11102016-retired..pdf>

⁶ <https://iowaagriculture.gov/sites/default/files/weights/E15%20Access%20Standard%20Flyer.pdf>

⁷ https://iowarfa.org/wp-content/uploads/2025/11/Iowa-E15-UST-Compatibility-Analysis.Final_.pdf

The criteria for an E15 Access Standard waiver fall into three categories that can loosely be characterized as:

- Class 1 – really old USTs.
- Class 2 – USTs that would need to be replaced (likely certain types of single-walled fiberglass tanks).
- Small retailer – regardless of compatibility, eligible if under annual fuel sales threshold.

As of this date, according to the Iowa Department of Agriculture's E15 Access Standard implementation website⁸, out of Iowa's roughly 2,200 retail fuel locations, 102 have received a Class 1 waiver, while 65 have received a Class 2 waiver. It is reasonable to assume that some of the locations receiving a "small retailer" waiver also had incompatible USTs, but there is no way to know from publicly available information. Further, it is also reasonable to expect that waiver requests will continue to be filed before the end of the year. However, it is clear that USTs, while not universally compatible, are not a major hurdle to widespread E15 access for consumers.

For fuel retailers with incompatible USTs, the cost to upgrade their system would be considerable. IRFA is not familiar with how California UST regulations may impact replacement costs, but here in Iowa, we would assume a cost in the six figures. It is important to keep in mind that, based on Iowa's experience, the fuel locations with tanks old enough to be incompatible with E15 are in locations with relatively lower fuel sales. The same is very likely true in California. In addition, access to E15 for any consumer is better than access to E15 for no consumers. Finally, our understanding of California UST policy indicates that the old, incompatible tanks would need to be replaced in the near future, whether the retailer chose to offer E15 or not.

E15 is Not a Mandate: This is a good point at which to note that facilitating regulations and guidance to implement AB30 is NOT mandating E15. It does not require even one retailer to offer E15, nor does it require even one motorist to choose to purchase E15. Proper rules and guidelines simply make it possible for a retailer to offer E15 if they feel it is a good business decision. Likewise, if retailers choose to offer E15 to their customers, those customers can choose to purchase E15 or not. We mention this because there seemed to be some confusion on this point during the October 14 scoping workshop.

It is also important because CARB has **not** been tasked with creating a situation whereby **all** retailers can/must offer E15 or where **all** motorists can/must purchase E15. AB30 simply seeks to create an opportunity to sell/buy E15 in California. Each retailer will assess their situation (from equipment compatibility to customer needs) individually and make a business decision. Motorists have that same choice.

⁸ <https://iowaagriculture.gov/e15access>

While IRFA will seek to provide the Iowa experience on all the questions asked by CARB, it strikes us that some are quite frankly outside of what CARB needs to know to properly implement AB30. The proper course of action for CARB to implement the legislation in a manner to maximize E15 access is not dependent on whether 10% or 90% of USTs are compatible. It is not impacted by the typical retailer dispenser layouts, octane levels, or projected adoption rates.

To be clear, IRFA believes that most retailers with compatible USTs could choose to offer E15 (dependent on CARB requirements) and that given the choice, many/most consumers will choose the cost savings of E15 (the savings likely larger in California than any other state given its LCFS). But AB30 only seeks to make these choices available. There is no requirement.

Fuel dispensers: As mentioned at the beginning of our comments, Iowa has led the way in offering ethanol blends – from E10 to E85 to E30 to E15 – since 1978. Each of these shared one thing in common: at the introduction of each new ethanol blend, there were no UL-listed dispensers for the new blend. Pioneers must blaze new trails.

As the popularity of E85 grew, larger corporate chains wanted to join locally owned retailers in offering E85. These larger, multistate entities wanted more regulatory certainty. Tired of waiting on UL for years, in 2016, Iowa passed a law allowing E85 to be sold from “E10” dispensers with certain monitoring requirements.⁹ Interestingly, this provision no longer exists in current Iowa Code because UL finally caught up to Iowa innovation!

In March of 2009, Growth Energy sought U.S. EPA approval of E15 as a registered fuel. EPA first approved E15 in October 2010¹⁰, later expanding the approval in 2011.¹¹ As this request and approval process was playing out, Iowa once again found itself without a UL-approved dispenser for a cutting-edge fuel.

As the UL test fuel for certifying E10 dispensers actually included 15% ethanol, in February 2009, UL announced that it supported local “authorities having jurisdiction” to approve the use of E15 in UL87/87A dispensers.¹² Moving quickly, in July 2009, the Iowa Fire Marshal acted on UL’s guidance and approved the use of E15 through all above-ground E10 equipment.¹³

⁹ <https://www.legis.iowa.gov/docs/code/2016/455G.31.pdf>

¹⁰ https://www.epa.gov/archive/epapages/newsroom_archive/newsreleases/bf822ddbec29c0dc852577bb005bac0f.html

¹¹ https://www.epa.gov/archive/epapages/newsroom_archive/newsreleases/8206ab91f87cec088525781f0059e65c.html

¹² <https://energy.agwired.com/2009/02/20/underwriters-laboratory-allows-e15-in-gasoline-pumps/>

¹³ <https://www.legis.iowa.gov/docs/aco/arc/7977B.pdf>

In 2012, the first Iowa station (second in the nation) received a green light from the U.S. EPA to begin offering E15.¹⁴ Over a decade later, Iowa has gone from one E15 station to over 1,000. Starting with one customer at a local coop, today Iowa is on track to sell nearly 500 million gallons of E15 in 2025.

There is one other fact shared by all of the new ethanol blends introduced in Iowa since 1978 – no dispenser issues or failures despite the need to move quicker than official UL approvals. It is fair to say that Iowa took a risk in order to be a fuel pioneer. And the risk paid off. Despite your “49er” history, this is one area where California does not need to be a pioneer. Iowa and other states have years of positive experience from which California can draw. *IRFA urges the California “authority having jurisdiction” to follow the trail blazed by Iowa and other states and to recognize that “E10” dispensers can safely offer E15.*

UL testing and guidance, and Iowa’s experience, prove this to be the commonsense path forward. Forcing retailers to spend tens of thousands of dollars to replace dispensers that are compatible with E15 simply makes no sense (or cents).

Upgrade Costs

For retailers with compatible USTs, the costs to upgrade are minor. Most will already have dispensers specifically warrantied by Gilbarco or Wayne to offer E15. For the rest, based on the testing and years of real-world experience noted above, California can and should simply deem all dispensers compatible with E15.

Outside of those main components, in Iowa¹⁵ there are three areas that may require upgrading: 1) hanging hardware, 2) shear valves and flex connectors, and 3) submersible pumps, probes, and float kits. Luckily, all of this equipment is easily accessible and relatively inexpensive.

When the Iowa legislature was enacting the E15 Access Standard, this topic received a great deal of attention. In order to get a disinterested expert opinion, IRFA solicited a sample quote from an out-of-state fuel equipment installer with much experience conducting E15 conversions. Petroleum Equipment, Inc. of Kansas City projected the cost for a typical retailer is usually \$5,000 to \$10,000.¹⁶

IRFA understands that California’s Stage 2 vapor recovery requirements may increase this cost in some cases. This can easily and safely be avoided. *We urge CARB to simply extend CARB Stage 2 equipment certification from E10 to E15.* E15 has slightly reduced vapor pressure and emissions compared to E10; therefore, logic dictates that

¹⁴ <https://www.thegazette.com/business/linn-co-op-to-get-boost-with-e15-sales/>

¹⁵ It is possible that California regulations may have already reduced the need for upgrades.

¹⁶ See Attachment A

any system certified for use with E10 would be more than capable of handling E15. Much like E10 dispensers, this would prevent the needless expense of replacing equipment that would clearly work with E15.

Additionally, this might be the right time for CARB to reconsider its Stage 2 vapor recovery requirements in general. IRFA does not claim to be an expert, but we read several experts saying that, at best, the modern fleet of cars does not require vapor recovery systems on dispensers because vehicles already have onboard systems and, at worst, the dispenser systems actually conflict with vehicle systems and result in greater evaporative emissions, which serves no one's interests.

How Will Retail Stations Implement E15?

Again, IRFA believes many of these topics are outside of the scope of information needed by California to adopt rules to safely expedite access to E15. The answers to all three of these topics don't change the directive given by AB30.

Dispenser Layouts

With over a decade of pioneering experience, Iowa has witnessed many retailers, big and small, use a variety of dispenser layouts to offer E15. IRFA believes it is best to allow each retailer to make its own layout decision. Having said that, there is clear and convincing data to guide those retailer decisions. Offering E15 from the same hose (or from the same side of a dispenser) as other "standard" fuels like E0 or E10 will dramatically increase sales compared to offering E15 apart from the standard fuels, on the opposite side of the dispenser.

Will E15 Be in All Grades/Octane Levels of Fuels?

Based on our experience in Iowa, this will vary by retailer, each choosing the best option based on their equipment and customer needs. The majority of stations in Iowa offer at least two blends/non-blends of ethanol. You can easily find stations offering E10 and E15. Some stations have decided to replace E10 with E15 across all octane levels. And while we may not understand the infatuation with the past, it is also not hard to find stations in Iowa that still offer E0, especially at higher octane levels preferred by motorcyclists, small engines, and boats. The clear lesson from Iowa is that retailers will continue to offer choices to their customers.

E15 Adoption Rates

It is impossible for IRFA to project adoption rates in California without knowing how CARB will answer the questions above. With the correct regulations, E15 could become a very popular fuel option in the short term. If CARB chooses the path of low-cost adoption for retailers, why wouldn't retailers with compatible USTs move quickly to offer

the lowest-cost fuel for standard vehicles?¹⁷ This would promote the dual goals of reducing consumer fuel prices while generating additional LCFS credits. It's literally a win-win. In Iowa, when one retailer offers E15, usually priced 10 to 20 cents per gallon lower than E10, it doesn't take long for other retailers to make plans to follow suit.

Recent data from Iowa should be encouraging for CARB. The state gathers data from fuel terminals on a monthly basis, and because a meaningful portion of blending occurs after fuel leaves the terminal, the state also collects data from retailers once a year.

In February 2024, the U.S. EPA granted a petition by eight Midwestern states for a fuel regulatory change that essentially allowed E15 to be sold in those states throughout the year.¹⁸ As an RFG state, California can already offer E15 year-round. Various parties petitioned the EPA to delay implementation of the rule, and in February 2025, the EPA announced it would uphold the original implementation date of April 28, 2025.¹⁹ The impact of this clarity has been quick and powerful.

In late October, the Iowa Department of Revenue released the Fuel Tax Monthly Report for September 2025.²⁰ The report revealed a new monthly record for E15 sales at the terminal level of over 33 million gallons. Attachment B details the E15 sales reported by Iowa terminals from the beginning of 2022 through September of this year.

It is important to note that since EPA confirmed year-round E15 access in Iowa, the sales numbers have increased dramatically. Every month since March 2025 has set a new E15 sales record.

The attachment also lists the E15 sales reported annually by Iowa retailers.²¹ This number is higher than the sum of the monthly terminal reports, as some blending occurs downstream of the terminal. By estimating the final three months of terminal E15 sales and applying historical average downstream blending, we can estimate that Iowa E15 sales in 2025 will more than **double** those in 2024, reaching nearly 500 million gallons, or 33% of Iowa's fuel sales. *Iowa has shown that when regulations allow consumers the option of E15, they choose it.*

¹⁷ E85 will remain the best price option for motorists with flexible fuel vehicles (FFVs).

¹⁸ <https://www.chsinc.com/news-and-stories/2024/04/04/e15-availability-update>

¹⁹ <https://www.epa.gov/newsreleases/ahead-summer-driving-season-epa-allows-expanded-e15-access-midwest-states-year-round>

²⁰ <https://revenue.iowa.gov/media/4308/download?inline>

²¹ <https://revenue.iowa.gov/media/4219/download?inline>

Potential E15 Impacts

Consumer Cost Savings

From our vantage point watching AB30 move through the legislative process from afar, it certainly seemed like the desire to reduce fuel costs for California motorists was a central, driving factor.

In Iowa, E15 is typically priced 10 to 20 cents below E10, which in turn is priced 45 to 65 cents per gallon below E0. E85 has an even bigger discount. In the first year of guaranteed year-round E15 access, using an average savings of 15 cents per gallon, Iowans are on track to save an estimated \$75 million.

IRFA believes the E15 discount in California should be larger than in Iowa, as California has essentially put a “carbon price” on fuel. Increasing the ethanol content by 50% leads to a big carbon reduction. As such, we would expect the E15 discounts in California to be 30 to 40 cents per gallon. While various studies can predict varying levels of additional savings, *the fact remains that E15 will absolutely save Californians money – we just don’t know exactly how much.*

Fuel Mileage

CARB will no doubt receive several “earnest” comments on this topic, citing BTU numbers for gasoline and ethanol to draw simplistic arithmetic conclusions. Putting aside that these “analyses” nearly always quote BTU levels unrelated to modern CARBOB fuel, CARB knows full well that such simplistic exercises are meaningless.

While BTU content is a factor, it is important to keep in mind actual real-world fuel performance. Given its higher oxygen content, ethanol not only burns more completely than “gasoline” but helps the petroleum portion of the fuel blend combust more completely as well. Blending ethanol reduces tailpipe emissions, and tailpipe pollution is nothing more than unburned BTUs of hydrocarbon components. In addition, ethanol’s latent cooling effect reduces knock, or pre-ignition, of fuel blends and modern vehicles take advantage of this to increase performance and fuel efficiency.

As part of E15’s multimedia testing, the University of California Riverside conducted the most extensive fuel economy testing of E15 of which we are aware. The results comparing the representative vehicle fleet running on both E10 and E15 were essentially the same: 28.652 mpg on E10 to 28.284 mpg on E15. In fact, twenty percent of the tested vehicles got the same or higher mileage on E15. *The small difference in fuel economy is essentially meaningless as proper tire inflation, aggressive driving, or even a strong headwind can impact fuel economy by a much larger amount.*

Incompatible Vehicles

IRFA is unaware of a single issue of E15 harming a supposed “incompatible” vehicle. If it had, I’m sure our friends in the petroleum industry would have been sure to let us know.²² It is important to keep in mind that the EPA did not determine that E15 was incompatible with 2000 and older vehicles. Those vehicles were not approved because they were already so old that they would die from natural causes during testing. *With nearly 95% of California’s vehicle fleet comprised of 2001 and newer vehicles, it makes sense to give these vehicle owners the lower-cost option of E15.*

Misfuelling Concerns

Iowa has had E15 sales since 2012 without a known misfuelling incident. The U.S. EPA requires a comprehensive misfuelling mitigation plan that is more than sufficient to protect consumers. The requirements included a mandatory label and fuel survey.

CARB referenced a five-year-old study conducted by the Outdoor Power Equipment Institute (OPEI) to ask whether consumers are confused by E15. It is important to note that nearly every respondent in that survey had actually never seen E15 at the pump. It is hardly surprising they were confused when asked about a product they had never seen or hear of.

In truth, the mandated EPA label is quite clear. IRFA has always found it interesting, if not humorous, that OPEI thinks its customers are too stupid to understand the EPA label on one hand, but perfectly capable of owning and safely operating a 28-inch chainsaw on the other hand (but maybe they’re lucky to still have two hands?).

Likewise, if California motorists can’t understand the EPA label, IRFA would suggest the fault lies not with the label, but with the state’s licensing requirements for people to drive around at 80 miles per hour in two-ton vehicles unsupervised. It is simply not defensible to suggest a person is mentally qualified to be a licensed motorist while simultaneously arguing the phrase “use only in...” is too difficult for them to understand. *Adding additional state-level requirements for retailers to the mandated U.S. EPA misfuelling regulations would serve only to reduce the availability of E15 while simultaneously increasing the cost for motorists who can access it.*

Octane Labels: CARB mentioned that California does not require an octane label for E15. In Iowa, we have never seen a fuel pump with any registered fuel (as opposed to alternative fuels like E85) that did not post a minimum octane rating. Some retailers

²² A few years ago, IRFA staff met a young lawyer at a government agency whose previous summer internship was with a major petroleum association. Their entire job had been to scan national, state and local lawsuit databases to find any lawsuits alleging E15 harmed an engine. They never found one.

choose to label E15 as 88-octane to highlight the positive increase in octane the extra ethanol provides, while others choose to label it 87-octane because that is what consumers are used to seeing at the pump. Both choices are legal and sensible. *IRFA encourages CARB to recommend octane rating labeling, but we seriously doubt any retailer would forgo the practice regardless.*

Conclusion

We will conclude where we began, by asking the question: does California want to seize the authority granted in AB30 to move quickly to provide low-cost E15 to the maximum number of California motorists under safe and secure conditions already in use for years in other states, or does California want to ignore the lessons learned from other states and pursue an unnecessarily cautious, slow, and expensive path forward?

We hope our comments help give CARB the confidence to move with dispatch on a regulatory pathway that lowers barriers for retailers to offer E15. So often CARB has been the pioneer when it comes to fuel and vehicle regulations, blazing the trail that other states and even the federal government often followed.

This time, over a decade of E15 experience is at CARB's disposal. There is no need for CARB to be an E15 pioneer. IRFA hopes CARB will embrace the lessons of the pioneers who have gone before. There are clear answers to all of the questions CARB raised during its October 14 E15 Scoping Workshop. Answers supported by science, studies, and, most importantly, real-world experience. Answers that would allow E15 to be part of California's fuel cost solution in a matter of months, not years.

E15 can help reverse the increasingly high cost of fuel that has put a financial strain on motorists in California – if the correct regulatory framework is established. *IRFA urges CARB to create a safe and secure regulatory pathway for E15 to expeditiously achieve widespread consumer access.*

On this and any other issues, IRFA is ready to work with CARB to provide any further information or background where we may be of assistance. Please do not hesitate to contact me at mshaw@IowaRFA.org or 515-252-6249.

Sincerely,



Monte Shaw
Executive Director
Iowa Renewable Fuels Association

Attachment A



Petroleum Equipment, Inc. of Kansas City

1401 E. 9th St. Kansas City, MO 64106

Office: 800-431-0044

Cell: 913-230-0447

Email: toomey@peiofkc.com

Date: 3/30/22

Scope of work:

Scenario 1, One disperser upgrade

Scenario 2, Four Dispenser upgrade

Scenario 3, Four Dispenser upgrade w/ pipe dope

Scenario 1

Equipment	Description	Price
Tank	Alternative fuel float kit Cap and ring kit	\$700.00 (included in above)
Dispenser	E85 Hanging hardware x 2	\$2,295.00
Labor	Time and Trip	\$350.00
Total		\$3,345.00

Scenario 2

Equipment	Description	Price
Tank	Alternative fuel float kit Cap and ring kit	\$700.00 (included in above)
Dispenser	E85 Hanging hardware x 8	\$9,180.00
Labor	Time and Trip	\$1,100.00
Total		\$10,980.00

Scenario 3

Equipment	Description	Price
Tank	Alternative fuel float kit	\$700.00
	Cap and ring kit	(included in above)
Dispenser	E85 Hanging hardware x 8	\$9,180.00
Labor	Time and Trip	\$1,100.00
Pipe Dope	(Dig out top of tank)	
	Concrete replacement	\$1,200.00
	Pipe Dope	\$160.00
	Labor	\$3600.00
Total		\$15,940.00

NOTES:

This is a Budget bid only

Mobilization NOT included

Existing hanging hardware is likely compatible with up to 25% ethanol and will not need replaced.

New equipment is included in above scenarios per request.

Attachment B

2025 Iowa E15 Sales

Monthly Fuel Terminal Reports E15 or Higher Taxable Gallons

January	22,228,444
February	26,479,198
March	22,241,616
April	27,854,905
May	26,269,185
June	29,501,175
July	29,891,865
August	30,135,224
September	33,588,570
October	33,588,570
November	33,588,570
December	33,588,570

Oct - Dec. numbers assume September levels continue.

TOTAL Terminal Sales* 348,955,892

Annual Retailers Report^ 498,508,417
Total E15 Sales

ESTIMATE

Based on Terminal Sales
Capturing 70% of Retail Sales
(average of last 3 years)

E15 % of Iowa Sales 33.2%

Based on estimate of 1.5 BG Iowa "gasoline" sales

* <https://revenue.iowa.gov/media/4308/download?inline>

^ <https://revenue.iowa.gov/media/4219/download?inline>

2024 Iowa E15 Sales

Monthly Fuel Terminal Reports E15 or Higher Taxable Gallons

January	8,518,661
February	11,734,092
March	10,431,746
April	9,153,016
May	12,124,157
June	12,700,880
July	14,276,341
August	13,555,340
September	16,850,136
October	15,410,689
November	19,159,861
December	18,172,104
TOTAL Terminal Sales*	162,087,023

Annual Retailers Report^	256,741,594
Total E15 Sales	

% of E15 Sold at Terminal	63.1%
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2023 Iowa E15 Sales

January	10,302,587
February	10,901,082
March	5,929,916
April	7,422,917
May	8,895,184
June	10,619,058
July	10,363,282
August	11,173,889
September	9,274,890
October	11,150,130
November	11,860,495
December	11,992,898

Total Terminal Sales*	119,886,328
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Annual Retailers Report	178,529,104
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Total E15 Sales

% of E15 Sold at Terminal	67%
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2022 Iowa E15 Sales

January	5,812,536
February	5,700,279
March	6,151,484
April	8,819,622
May	7,252,689
June	8,657,427
July	9,679,386
August	7,229,554
September	8,570,260
October	8,460,672
November	10,637,391
December	9,073,675

Total Terminal Sales*	96,044,975
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Annual Retailers Report Total E15 Sales	121,130,248
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% of E15 Sold at Terminal	79%
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November 18, 2025

California Air Resources Board
Matt Botill
Division Chief, Industrial Strategies Division
1001 I Street
Sacramento, CA 95814

RE: Comments on Proposed Introduction of E15 Fuel in California

Mr. Botill,

As Iowa's Secretary of Agriculture, I appreciate the opportunity to provide comments on California's implementation of allowing the sale of E15 to consumers.

Iowa is the national leader in biofuel production, with 42 ethanol biorefineries and 10 biodiesel facilities producing 4.6 billion gallons of ethanol and 353 million gallons of biodiesel respectively in 2024. Iowa's renewable fuels industry creates value-added markets for corn, soybeans, and other agriculture feedstocks, provides good paying jobs for thousands of Iowans, and offers cleaner burning, more affordable, homegrown fuel options to consumers. Additionally, Iowa is a national leader in biofuels usage, with more than 13 years of E15 adoption. With almost half of Iowa's roughly 2,200 fuel retailers offering E15 today, I am hopeful that our track record can serve as a useful reference point as you work through implementation of this important policy.

When given the choice at the pump, Iowa drivers are consistently choosing E15, and it now represents a significant and rapidly increasing share of all gasoline gallons sold in our state. E15 usage in Iowa has continued to grow year over year, reflecting strong consumer confidence and clear market demand. Statewide, E15 sales have grown more than six-fold over the past five years, increasing from 41.6 million gallons sold in 2019 to 256.7 million gallons in 2024. Iowa's experience demonstrates that, once available, E15 quickly becomes a popular and mainstream fuel option.

E15 has also provided significant benefits to consumers who have faced rising costs over the last several years. E15 is almost always priced well below regular unleaded gasoline, saving drivers around 15 cents per gallon at the pump without asking them to change anything about how or where they fuel up. In 2024 for example, Iowa drivers saved an estimated \$38.5 million by choosing E15 over E10, demonstrating that E15 is a simple, immediate way to reduce fuel costs for families.

Finally, I want to share Iowa's real-world experience with fuel infrastructure compatibility. As noted earlier, E15 has been available in Iowa for well over a decade and during that time we have not encountered widespread or systemic compatibility challenges. In fact, existing tanks,

pipng, and dispensers have overwhelmingly proven capable of safely and reliably handling E15. In fact, our confidence in the durability of existing infrastructure was a key reason the Iowa General Assembly enacted Iowa's E15 Access Standard.

Beginning January 1, 2026, Iowa's E15 Access Standard will take effect. This 2022 law requires most fuel retailers to offer E15 from at least one fueling position, unless they qualify for an exemption due to very old equipment or small-retailer status. As retailers prepare to comply, many have utilized the state's Renewable Fuels Infrastructure Program, which provides cost share grant funding, to help finance necessary upgrades. Notably, many of these projects are being completed for less than \$10,000, demonstrating that the cost of ensuring compatibility with E15 is reasonable. Iowa's experience should give California confidence that E15 can be integrated into existing retail infrastructure without undue disruption or cost to fuel retailers.

Streamlining the sale of E15 would provide California consumers with a cleaner burning, more affordable, domestically produced fuel option — one that has already been widely adopted and proven effective, economical, and reliable in Iowa and many other states. This step would align California with the growing number of states that have successfully incorporated E15 into their fuel supply.

Thank you for the opportunity to provide input. I encourage CARB to embrace the cost-saving benefits of American-made E15 as it works to expedite the availability of this more affordable fuel option for Californians. If my office can be helpful in any way as you move forward, please don't hesitate to reach out.

Sincerely,

Mike Naig
Iowa Secretary of Agriculture



November 24, 2025

The Honorable Shelley Moore Capito
Chairwoman
Committee on Environment & Public Works
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Sheldon Whitehouse
Ranking Member
Committee on Environment & Public Works
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone, Jr.
Ranking Member
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairwoman Capito, Chairman Guthrie, Ranking Member Whitehouse, and Ranking Member Pallone:

We appreciate the many positive changes seen at the federal level over the past several months to support farmers, ranchers, and rural communities. However, we are eager to find a year-round nationwide solution for E15. This will help ensure consumers have affordable and reliable options at the pump, extend fuel supplies, and help farmers in our states.

As of November, the National Agricultural Statistics Service is forecasting a record-setting 16.8 billion bushels of corn harvested in 2025, a 12 percent increase from 2024. While our farmers continue to innovate and increase yields, and considering market uncertainty, now is the time to unleash American energy by expanding American ethanol availability and production.

We urge you to pass the Nationwide Consumer and Fuel Retailer Choice Act of 2025, which supports the increases of domestic biofuel production and utilization. By ensuring the availability of nationwide year-round E15, you will help create new markets for our American farmers who are facing tightening demand, and Americans will also directly benefit at the gas pump.

Increasing domestic ethanol production will reduce our dependence on foreign energy, expand consumer choice, and eliminate inefficient federal regulatory barriers. Expanding domestic ethanol production and nationwide E15 access supports our hardworking farmers and fuel industry workers and ensures availability of affordable, home-grown fuel for all Americans.

We thank you for your consideration and urge swift passage of the Nationwide Consumer and Fuel Retailer Choice Act of 2025.

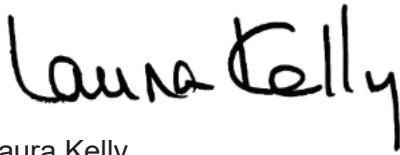
Sincerely,

Handwritten signature of Larry Rhoden in black ink.

Larry Rhoden
Governor of South Dakota

Handwritten signature of Kim Reynolds in black ink.

Kim Reynolds
Governor of Iowa

Handwritten signature of Laura Kelly in black ink.

Laura Kelly
Governor of Kansas

Handwritten signature of Tim Walz in black ink.

Tim Walz
Governor of Minnesota

Handwritten signature of Mike Kehoe in blue ink.

Mike Kehoe
Governor of Missouri

Handwritten signature of Jim Pillen in blue ink.

Jim Pillen
Governor of Nebraska

Handwritten signature of Tony Evers in black ink.

Tony Evers
Governor of Wisconsin



OFFICE OF THE GOVERNOR

207 STATE HOUSE
SPRINGFIELD, ILLINOIS 62706

JB PRITZKER
GOVERNOR

November 4, 2025

The Honorable Shelley Moore Capito
Chairwoman
Committee on Environment & Public Works
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Sheldon Whitehouse
Ranking Member
Committee on Environment & Public Works
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone, Jr.
Ranking Member
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairwoman Capito, Chairman Guthrie, Ranking Member Whitehouse, and Ranking Member Pallone:

As Illinois' agricultural community faces great uncertainty in international commodity purchases, I write today advocating for finding a solution to nationwide year-round E15 sales. Not only does this expand domestic markets for Illinois corn, it also provides much needed certainty for Illinois farmers enduring shrinking foreign markets and increasing domestic fuel production.

Ethanol is the fastest growing corn market with higher blends of ethanol reducing dependency on petroleum. Infrastructure investments in E15 stations have prepared Illinois for significant growth in the industry. Selling higher blends of ethanol year-round shows projections of ethanol demand increasing by 4.5 billion gallons between 2021-2035, which is a 1.5 billion bushel increase in corn demand.

In previous years, I have supported waivers allowing the year-round sale of E15 providing lower gas prices for consumers and stronger support of domestic biofuels and U.S. agriculture. Utilizing American ethanol year-round is a direct solution to reinforcing our energy supply and reducing consumer costs, and the issuance of nationwide use is a clear path toward these shared goals.

Thank you for taking this information under consideration. I urge passage of a measure ensuring the availability of nationwide year-round E15.

Sincerely,

A handwritten signature in black ink, appearing to read 'JB Pritzker', with a stylized, sweeping flourish at the end.

JB Pritzker
Governor of Illinois

CC:

The Honorable Richard Durbin
The Honorable Tammy Duckworth
The Honorable Jonathan Jackson [IL-01]
The Honorable Nikki Budzinski [IL-13]
The Honorable Eric Sorensen [IL-17]



Mike Sommers
President and CEO
API
202-682-8500
sommersm@api.org

October 21, 2025

The Honorable Mike Johnson
Speaker, United States House of Representatives

The Honorable John Thune
Majority Leader, United States Senate

The Honorable Hakeem Jeffries
Minority Leader, United States House of Representatives

The Honorable Charles Schumer
Minority Leader, United States Senate

Dear Speaker Johnson, Leader Thune, Leader Jeffries, and Leader Schumer:

On behalf of the American Petroleum Institute (API) and our nearly 600 member companies representing all segments of America's oil and natural gas industry, I write to share API's opposition to advancement of the *Nationwide Consumer and Fuel Retailer Choice Act of 2025* (S. 593 / H.R. 1346).

API recognizes the importance of giving consumers more options and supports the availability of year-round E15 fuel and policies that promote consumer choice at the pump. When the *Nationwide Consumer and Fuel Retailer Choice Act of 2025* was introduced, it reflected a set of assumptions about the biofuels and liquid fuels marketplace that have since changed dramatically. Over the past eight months, legislative, regulatory, and market developments have created a substantially different operating environment for refiners and fuel suppliers. These changes have led API to reassess its position and, ultimately, oppose advancement of the *Nationwide Consumer and Fuel Retailer Choice Act of 2025* in its current form.

This legislation was introduced in response to eight Midwest states that petitioned the Environmental Protection Agency (EPA) to opt out of the national summertime volatility waiver for E10, effectively requiring their states to be supplied a gasoline that was not fungible with the rest of the region. Earlier this year, EPA finalized this opt-out request. To comply with the requests by these states, API member companies invested in new infrastructure and refinery operations to produce boutique, regional fuel blends necessary



American
Petroleum
Institute

Mike Sommers
President and CEO
API
202-682-8500
sommersm@api.org

to meet those state-specific mandates. After the fuels were refined and delivered to the region, seven states asked to be exempt from their original requests. Mere days before these fuels were required at the terminal, EPA issued “emergency” waivers that effectively negated the states’ original opt-out requests turning these investments into sunk costs and creating unnecessary financial and operational harm to refiners.

Further complicating the fuels marketplace, the *One Big Beautiful Bill Act* that was enacted earlier this year introduced significant changes to Section 45Z Clean Fuel Production Tax Credits. Among other things, these changes to the new 45Z credits eliminated non-North American feedstocks with lower carbon intensity profiles from qualifying for the tax credit.

Additionally, EPA has proposed to reduce Renewable Fuel Standard (RFS) compliance credits (RINs) for imported fuels and foreign feedstocks by 50 percent. Because there is insufficient domestic feedstock to supply the available U.S. biofuel production capacity, foreign feedstocks will still be needed to ensure that U.S. production facilities can viably operate.

Recent EPA action on RFS Small Refinery Exemption (SRE) petitions and pending action on potential reallocation of volumes from SREs disrupts established market dynamics by effectively rewarding certain small refineries that have not invested in RFS compliance while punishing those who have. Potential reallocation of these SRE volumes threatens to exacerbate this distortion by imposing higher compliance costs on non-exempt refineries that have already made significant biofuels investments and are committed to fulfilling their RFS obligations. Today’s reality for refiners and fuel suppliers is very different than the circumstances under which the *Nationwide Consumer and Fuel Retailer Choice Act of 2025* was originally introduced.

Refiners are now navigating shifting federal compliance structures, a patchwork of state mandates, and a biofuels marketplace that is uncertain. As such, any legislative consideration of year-round E15 should reflect today’s realities and not those of prior years. This means adopting a more holistic approach to E15 within a policy framework that considers the needs and challenges of liquid fuels market participants, including those who have made substantial investments in making the RFS function as intended and continue to supply affordable, reliable liquid fuels to American consumers.



American
Petroleum
Institute

Mike Sommers
President and CEO
API
202-682-8500
sommersm@api.org

API stands ready to work with Congress to develop a balanced approach to E15 legislation that promotes fuel choice, supports investment certainty, and contributes to a stable and fair marketplace for American consumers.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mike Sommers', is written over a light blue circular background.

Mike Sommers

President and Chief Executive Officer
American Petroleum Institute

CC: The Honorable Deb Fischer
United States Senate

The Honorable Adrian Smith
United States House of Representatives

E15 and SRE Legislative Concept

- Grant RVP waiver for E15 fuel
- Amend Small Refinery Exemption¹
 - Eliminate Small Refinery Facility designation (75K bpd per facility)²
 - Replace with Small Refining Company designation (75k bpd per company)³
 - Clarify “disproportionate economic hardship”
 - Such hardship must be directly caused by cost of compliance with RFS
 - Remove DOE consultation and usage of DOE matrix
 - Proportional Exemptions
 - EPA shall determine any exemption amounts based on the exact degree of disproportionate economic harm demonstrated by an applicant that is directly attributed to RFS compliance costs⁴
 - Prohibition on reallocation of exempted volumes
 - Effective date is compliance year 2026

Potential Impact – RINs

(based on publicly available EPA & EIA data)

- In 2024, the RVO required a total of 21.89 billion RINs
- The current capacity share of all small refineries (37) receiving 100% exemptions could account for 2.24 billion RINs
 - EPA final decisions on 2024 SREs exempted an anticipated 730 million RINs, a 67% reduction from 2.24 billion RINs

¹ 42 U.S. Code § 7545(o)(9) (CAA 211(o)(9))

² 42 U.S. Code § 7545(o)(1)(K) (CAA 211(o)(1)(K))

³ Any affiliated entities will be included in new company-wide definition

⁴ Such amount shall be determined to the exact percentage of disproportionate economic harm and not rounded to the nearest large fractional proportion as done previously

- Under the proposed modified approach, the capacity share of small refineries (15) receiving 100% exemptions could account for 548 million RINs
 - Based on EPA actions, the proposed modified approach could reduce 2024 SREs to 205 million RINs, a 91% reduction from 2.24 billion RINs

Potential Impact – Facilities

(based on publicly available EPA & EIA data⁵)

Companies with Total Operating Capacity ≤75K bpcd COMPANY-WIDE	
Company Name	Total Operating Capacity
Martin Resource Management Group (Cross Oil)	7,500
American Refining Group Inc	11,000
San Joaquin Refining Co Inc	15,000
Silver Eagle Refining Inc (2 facilities: SE Evanston, SE Woods Cross)	18,000
Starlight Relativity Acquisition Co (The San Antonio Refinery)	20,000
Kern Oil & Refining Co	26,000
FJ Management Inc (Big West Oil Co)	31,664
Countrysmark Coop Inc	34,500
Ergon Inc (2 facilities: Ergon Refining, Ergon West Virginia)	48,800
Hunt Consolidated Inc. (2 facilities: Hunt Refining, Hunt Southland)	61,000
Red Apple Group Inc (United Refining)	67,000
Placid Oil Co	75,000
Total Operating Capacity of Companies ≤75K	415,464
Total Operating Capacity of All 37 Facilities ≤75K	1,702,146
Percent Reduction of Modified Approach	75%

⁵ EIA Refinery Capacity Report: <https://www.eia.gov/petroleum/refinerycapacity/>; EPA RFS Small Refinery Exemptions webpage for 2018-2024: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/rfs-small-refinery-exemptions>

December 4, 2025

President Donald J. Trump
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. President:

We write on behalf of organizations representing ethanol producers, oil refiners, fuel marketers, travel plazas, truck stops, and convenience store retailers to express the need for long-term policy certainty across the transportation fuel sector. Our diverse group of industries often have unique policy priorities and market concerns, but we have always shared a common goal to provide affordable, reliable liquid fuels for consumers. However, our collective ability to continue to do so is being threatened by the ongoing uncertainty regarding the sale of year-round E15 and the administration of Small Refinery Exemptions (SREs) under the Renewable Fuel Standard (RFS) program.

E15 continues to play an expanding role in the fuel marketplace, but unpredictable short-term waivers, seasonal and geographic restrictions, and regionally unique summer gasoline specifications in the Midwest have created a shifting regulatory environment that complicates planning and investment. Legislation allowing the year-round, nationwide sale of E15 would improve fungibility and substantially reduce many of the complexities that arise for our industries as we operate in a national marketplace.

In addition, we believe Congress must take legislative action to reform the Small Refinery Exemption program. The current SRE structure has encouraged a system of winners and losers that distorts the marketplace, creates instability, and ultimately, hurts consumers. A more consistent and narrowly applied SRE structure would create a far more predictable regulatory environment.

The absence of nationwide E15 and the administration of the SRE program present varying challenges for our industries. They both impact investment and compliance planning, blending decisions, and the stability of national fuel supply chains. Addressing these two issues through clear legislation would provide a more coherent and durable policy foundation, reduce volatility, and enhance confidence for all participants in the transportation fuel sector.

For these reasons, we respectfully urge you to support legislation that brings lasting certainty to these fuels issues and supports a stable, efficient marketplace.

Thank you for your attention to these matters. Our organizations remain committed to supporting constructive solutions as Congress evaluates next steps.

Sincerely,



American Petroleum Institute



Growth Energy



National Association of Convenience
Stores



NATSO, Representing America's Travel
Centers and Truck Stops



Renewable Fuels Association



SIGMA: America's Leading Fuel Marketers

CC:

The Honorable Mike Johnson
Speaker, U.S. House of Representatives

The Honorable Hakeem Jeffries
Minority Leader, U.S. House of
Representatives

The Honorable John Thune
Majority Leader, U.S. Senate

The Honorable Chuck Schumer
Minority Leader, U.S. Senate

The Honorable Doug Burgum
Secretary, U.S. Department of the Interior

The Honorable Brooke Rollins
Secretary, U.S. Department of Agriculture

The Honorable Chris Wright
Secretary, U.S. Department of Energy

The Honorable Lee Zeldin
Secretary, U.S. Environmental Protection
Agency

Quick Background on E10/E15, Midwest State Action and Potential Emergency Waivers

The Problem

It is difficult to sell E15 during the summer months in conventional gasoline areas because E10 and E15 have different regulations (E15 is not banned, etc.). E10 gets a one-pound RVP waiver. E15 does not. So, gasoline blendstock for E10 can be 9 psi while it would need to be 8 psi or lower for E15. Refiners supply 9 psi gasoline and E15 is frozen out of the market.

How we got here

1. Several years ago, oil interests blocked an effort by Sens. Fischer, Ernst and Marshall to pass legislation through the Senate EPW Committee granting E15 the same one-pound waiver as E10. With the same regulations, the same gasoline blendstock would have worked for both.
2. Next, Trump's first administration granted the one-pound waiver for E15 via EPA rule. All was good and many retailers moved forward with E15 until some in the oil industry sued, and the DC Circuit Court threw out the rule. For the last 3 years, emergency waivers have allowed these retailers to continue to offer E15.
3. With legislative and regulatory avenues blocked, a coalition of 8 Midwestern states took the only action left open to them. The governors exercised their rights under the Clean Air Act to request the REMOVAL of the one-pound waiver for E10. No one wanted this solution as opposed to granting a waiver for E15, but this was the only option allowed to the governors under the CAA.
4. So, in these 8 states, E10 and E15 have the same regulations (volatility limit). Therefore, any gasoline blendstock that is suitable for E10 is also suitable for E15. E15 cannot be frozen out in the summer.

E15 Nationwide Emergency Waiver

42 other states still face a "freeze" on E15 sales during the summer. This would be bad for retailers and consumers in those states and would unnecessarily limit U.S. fuel supplies. This would **ALSO** hurt the ethanol producers and corn growers in the Midwestern states (where E15 can be sold) as they supply corn/ethanol for these other states.

So E15 supporters are pushing a nationwide emergency waiver (based on Ukraine war and historically low fuel reserves) for E15 this summer. All pro-ethanol groups support this – including the 8 Midwestern states for the reasons stated above.

The Catch

If E15 is given a nationwide waiver, then the Midwestern states would be back to the situation where E10 and E15 have DIFFERENT fuel regulations – the very thing they wanted to avoid in the first place. So, it is completely logical and appropriate for these states to want E10 to be given the same emergency waiver as E15 to keep the regulations the same.

While avoiding conflicting regulations, it also allows refiners to leave higher volatility components (butanes, pentanes) in the gasoline blendstock thereby increasing fuel supplies during this national supply emergency (the basis of the E15 waiver). ALSO, it would allow maximum fungibility of gasoline blendstocks between states because all of the regulations would be the same, something important during an emergency fuel supply situation.

Bottom Line

The Midwest states asking for an emergency waiver for E10 ***IF*** a waiver is granted for E15 is consistent with the desire to see similar regulations for E10 and E15. It maximized U.S. fuel supplies during the summer emergency, and it allows complete fungibility of gasoline supplies during this emergency.

Granting a waiver for E15 and not E10 in these Midwest states could do the opposite – treating E10 and E15 differently, removing gasoline components from the market thereby reducing supplies, and creating a lack of fungibility of gasoline supplies during a supply emergency.

To best address the emergency supply situation, the EPA should grant a nationwide E15 volatility waiver and a similar waiver for E10 in the Midwest states that do not currently have a permanent waiver for E10.

Consumer win. Retailers win. Refiners win. Ethanol producers win. Corn growers win. American wins.

4c. Tax Credits



September 10, 2025

U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

Dear Assistant Secretary Kies,

Clean Fuels Alliance America (Clean Fuels) is the U.S. trade association representing the entire biodiesel, renewable diesel, and sustainable aviation fuel supply chain, including producers, feedstock suppliers and fuel distributors. Made from an increasingly diverse mix of resources such as recycled cooking oil, soybean oil, and animal fats, the clean fuels industry supports increasing domestic production of renewable fuel to achieve energy dominance as part of the Administration's "Unleashing American Energy" Executive Order.

Clean Fuels appreciates the work the U.S. Department of the Treasury (Treasury) is doing to implement the One Big Beautiful Bill Act (OBBBA). However, the recently published Unified Agenda noting the Notice of Proposed Rulemaking (NPRM) for sec. 45Z is not scheduled until May 2026 is raising significant concerns throughout the industry. Without guidance or rulemaking, U.S. biodiesel, renewable diesel, and sustainable aviation fuel (SAF) producers are facing difficulties finalizing feedstock contracts, securing capital flows, and meeting project deadlines without knowing the how to utilize the credit. The need for additional certainty is urgent, as the market continues to face uncertainty for 2025 with only limited guidance on how 45Z should be implemented. In the absence of a rulemaking process, Clean Fuels respectfully requests that the Administration provide some stopgap guidance, perhaps in the form of a Notice, to provide certainty to the market for filing and claiming the credit for the current year, in addition to 2026 and beyond.

As a result of the many welcome changes to the §45Z Clean Fuel Production Credit become effective in 2026, we ask that Treasury provide clear rules and guidance promptly. The technical issues that continue to confront biofuels companies, their outside counsel and their accountants include but are not limited to rules defining "qualified sales", procedures available to taxpayers who are producing fuel at facilities owned by another party, and issues related to the OBBBA extension of the sec. 40A small agri-biodiesel producer credit.

"Qualified Sales"

Notice 2025-10 states that the forthcoming § 45Z proposed regulations would define a qualifying sale for use in a trade or business under § 45Z(a)(4)(B) to go to an unrelated purchaser who uses the fuel "as a fuel" (i.e. combusts it in an engine). This language inappropriately narrows the definition specified under section § 45Z(a)(4)(B) and raises the question of whether fuel sold to a reseller qualifies for the credit.

Missouri Headquarters
605 Clark Ave
PO Box 104898
Jefferson City, MO 65110

800.841.5849

Washington, D.C., Office
1331 Pennsylvania Ave, NW
Suite 505
Washington, D.C. 20004

888.246.3437

cleanfuels.org

The introduction of this language in the Notice indicates a misunderstanding of how fuels move through the supply chain. Within the fuel industry it is very common for producers to market and distribute biodiesel and renewable diesel through fuel marketers or distributors who neither blend the fuel nor place it into a customer's fuel tank as part of a retail sale. This supply network is critical to the distribution of renewable fuel products across the U.S. and creates stable market demand for the producer. Absent a clarification via a new Notice, small biofuel producers who often lack the marketing capacity and network to sell directly to end-users, and are especially reliant on resellers, may not be able to claim the §45Z credit.

With regard to “qualified sales” as defined in IRC sec. 45Z(a)(4) and related guidance, the OBBA has expressly provided Treasury with the authority to revise existing guidance for “qualified sales” rules and allow additional fuel sales arrangements, such as those made through fuel marketers.

Clean Fuels respectfully requests that Treasury publish new guidance as soon as possible to harmonize the 45Z rules with the statute and specifically remove requirements narrowing the definition of “use of a fuel in a trade of business”.

Rules Anticipating the Production of Fuel by the Taxpayer at a Facility owned by a Third Party

Another area where Clean Fuels members confront uncertainty regarding claiming the sec. 45Z PTC is the absence of clear guidance facilitating the practice of tolling. During periods of economic downturn and volatile feedstock markets, it has become a common if regrettable circumstance that some small, non-integrated operators are unable to operate their facilities year-round. In these situations, taxpayers have worked to keep the facilities operating and revenue flowing into the local communities by finding third parties who may have access to lower cost feedstock than the owners of the idled facilities. These so-called tolling arrangements are characterized by the third party providing the feedstock, producing the fuel, and selling the fuel. A tolling fee is paid by the third party to the owner of the biofuel production facility.

While these arrangements have become critical to keeping rural fuel plants open, taxpayers have encountered a tax issue associated with the need for the producer to be registered with the Internal Revenue Service (the IRS) to be eligible to claim the sec. 45Z PTC. If both taxpayers are registered producers, no issue arises, but in many cases the party who owns the facility is the registered taxpayer, but the third party, who is in this instance the physical producer of the fuel, is not registered with the IRS. It would be helpful if Treasury could clarify in the upcoming guidance how the third-party entity operating the facility may be treated as the producer of the fuel for purposes of the credit. Clean Fuels suggests that guidance could allow the tolling entity to be considered to be the producer for purposes of claiming the credit so long as at least either the tolling party, or the owner of the facility, is registered as a producer with the IRS.

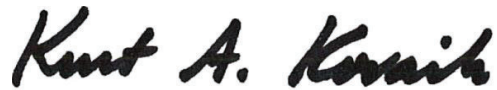
Small Agri-Biodiesel Producer Credit

Finally, as the OBBA extended the §40A Small Agri-Biodiesel Producer Credit, we also request guidance and rulemaking related to this credit promptly as it is only available for fuel produced after June 30, 2025, and sold or used before 2027. This credit will provide an additional income tax credit for small U.S. biodiesel producers that utilize domestic agricultural feedstocks and will help provide certainty to small producers as they make the transition to §45Z. If implemented quickly, OBBA extension of the §40A producer credit could contribute to the resuscitation of idled biofuel plants and preservation of rural jobs and economic opportunities.

Thank you for your work to implement the One Big Beautiful Bill Act and please consider Clean Fuels as a resource as §45Z and §40A are implemented and we all work to support continued investment, create jobs, and expand economic opportunity while furthering President Trump's goal for U.S. energy dominance.

We would appreciate the opportunity to meet with you to discuss our concerns in greater detail at your earliest convenience.

Thank you,

A handwritten signature in black ink that reads "Kurt A. Kovarik". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Kurt Kovarik
Vice President of Federal Affairs
Clean Fuels Alliance America
kkovarik@cleanfuels.org
202-737-8801

Provide Certainty in Clean Fuel Production Credits

U.S. biodiesel, renewable diesel, and SAF producers need policy certainty and clarity in the §45Z Clean Fuel Production Credit rules. U.S. Treasury has not proposed and finalized rules for §45Z – only issued incomplete and uncertain guidance. Clean Fuels urges Treasury to provide assurance to taxpayers for 2025 and 2026 as soon as possible through updated guidance with a reliance clause.

Clarify “Qualified Sales” Rules

The Inflation Reduction Act restricted the §45Z credit to only one type of “qualified sale” to unrelated parties that combust the fuel in their trade or business. This language disqualifies transfers to fuel marketers or to joint venture partners.

In the One Big Beautiful Bill, Congress gave Treasury authority to allow additional qualified sales – but Treasury must now provide guidance and rules.

Enable Tolling Arrangements

With uncertainty in policy, some small companies have stayed in business through tolling arrangements – essentially contracting with a third party to produce fuel from feedstocks they own.

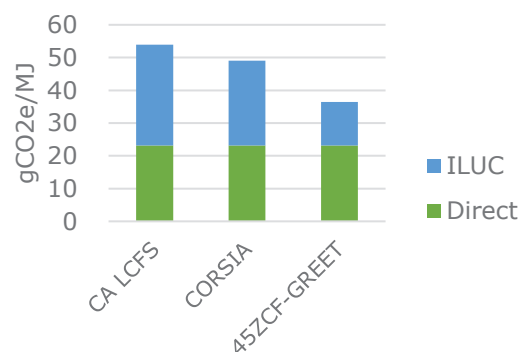
Clean Fuels suggests Congress clarify that feedstock owners contracting a tolling arrangement can register with IRS as producers and claim the tax credit.

Unfair ILUC Emissions Penalties Eliminated for U.S. Agriculture

ILUC models assess a theoretical risk that U.S. policy will influence overseas land use decisions. The models do not measure carbon emissions or prevent actual land use change – they simply penalize U.S. farmers and rural economies for this risk assessment.

ILUC estimates are extremely uncertain, varying widely across clean energy programs.

Soy CI Scores Across Clean Fuel Programs



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Modernize the Small Agri-Biodiesel Producer Credit

In the One Big Beautiful Bill, Congress revived the Small Agri-Biodiesel Producer Credit through the end of 2026. This credit provides an additional \$0.20 per-gallon income tax credit on up to 15 million gallons for small U.S. biodiesel producers that utilize domestic agricultural feedstocks.

The credit is a lifeline for several small producers that idled this year.

Clean Fuels thanks Congress for extending, modernizing and incorporating this credit into §45Z. We call on Treasury to assure producers they can claim this credit in the absence of any new guidance.

Maintain Exclusion of Co-Processed Fuel

Oil refineries may process up to 5% renewable feedstock with petroleum to produce diesel or jet. There is no economic barrier: co-processing oil refineries do not hire additional personnel, invest in new equipment, or build new supply chains. Co-processing refineries do not generate the same economic and societal benefits as stand-alone biorefineries. They use renewable feedstocks and crop-based oils on a discretionary basis, making them unreliable partners for farmers.

In 2008 Congress excluded co-processed fuels from claiming the biodiesel and renewable diesel tax credit. Clean Fuels supports Congress' decision to maintain that exclusion in the §45Z credit.

4d. Low Carbon/Higher Blends/FFVs

Monte Shaw

From: The Renewable Fuels Association <info@ethanolrfa.org>
Sent: Monday, November 24, 2025 7:16 AM
To: Monte Shaw
Subject: RFA Recommends California Implement FFV Standard



Monday, November 24, 2025

RFA Recommends California Implement FFV Standard

In [comments submitted](#) to the California Air Resources Board, the Renewable Fuels Association recommended the agency require flex fuel vehicle capability in all new vehicles with internal combustion engines sold in California, at the earliest practical model year. The comments were submitted in response to a CARB Drive Forward Light-Duty Vehicle Program Workshop on October 21.

“CARB’s number one guiding principle for the Drive Forward program, as stated in the staff presentation, ‘is to design stringent but flexible programs that achieve cost-effective emission reductions,’” wrote RFA Chief Economist Scott Richman. “RFA believes that implementing a well-structured combination of requirements and incentives to grow the market for higher-level ethanol blends such as E85 in California would be among the most affordable ways to achieve

significant reductions in criteria and greenhouse gas emissions from the state's light-duty vehicle population."

Richman noted that emissions testing at the University of California, Riverside indicated statistically significant reductions in NOx, CO2, PM and cumulative BTEX emissions with E85 compared to E10, and that emissions of CO and NMOG-NOx trended lower with E85. Further, over the last few years, E85 has consistently sold at nearly two dollars per gallon less than regular gasoline.

About the RFA

Since 1981, the Renewable Fuels Association has been the leading trade association for America's ethanol industry, working to drive expanded demand for American-made renewable fuels and bioproducts worldwide.

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Enable Biomass-Based Diesel to Fuel Maritime Vessels

Please co-sponsor the bipartisan ***Renewable Fuel for Ocean-Going Vessels Act (H.R. 1896, S. 881)***, sponsored by Sens. Pete Ricketts (R-NE) and Amy Klobuchar (D-MN) and Reps. Mariannette Miller-Meeks and John Garamendi (D-CA). Ocean-going cargo, tanker and passenger ships are demanding cleaner fuels. This legislation would clear a major roadblock by allowing U.S. biodiesel and renewable diesel producers to meet the needs of ocean-going vessels while preserving RFS credits. Supporters include the California Advanced Biofuels Alliance, Iowa Biodiesel Board, Minnesota Biodiesel Council, Nebraska Soybean Association, North American Renderers Association, and U.S. Grains & Bioproducts Council.

Potential BBD Use in Ocean-Going Vessels

International ships fueled in U.S. ports will use 1.6 billion gallons of distillate and 3.7 billion gallons of residual fuel oil in 2026, according to the U.S. Energy Information Administration.¹

Ocean-Going Vessel Fuels in the RFS

The RFS statute excludes *fuel for use in ocean-going vessels* from the definition of "transportation fuel."

Under EPA implementing rules, companies must retire RINs from biomass-based diesel (BBD) and other biofuels used in *ocean-going vessels*, which are ships with Category 3 engines and/or operating in "ocean waters, Great Lakes, or other internal waters."

In 2024, companies retired 13.8 million D4 RINs for BBD used in ocean-going vessels – a small number of RINs but a rapid increase from previous years, demonstrating the growing interest from the shipping industry.

Solution

The RFS defines "additional renewable fuel" [42 USC §7545(o)(1)(A)] as biomass-based fuels used to replace fossil fuels present in home heating oil and jet fuel.

Qualifying RINs from renewable heating oil and sustainable aviation fuel can therefore be used for RFS compliance – without creating an additional compliance obligation.

H.R. 1896/S. 881 would include "fuel for ocean-going vessels" in the definition of "additional renewable fuel." It would preserve millions of RINs currently being discarded and open markets for sustainable maritime fuels.

¹ EIA, Annual Energy Outlook 2025, Table 49: Freight Transportation Energy Use.

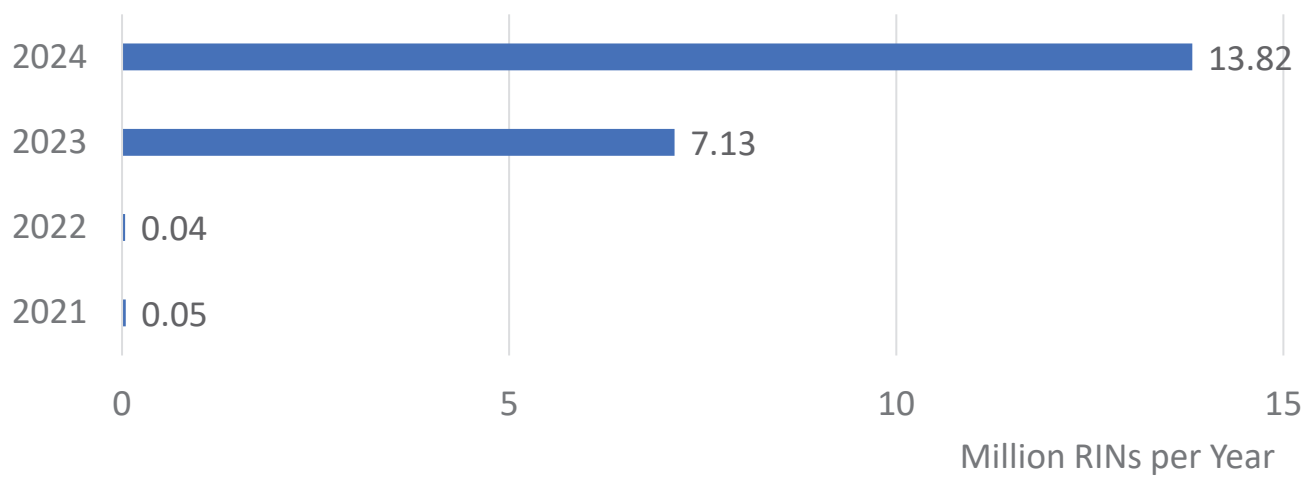
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Annual D4 RINs Retired for Use in Ocean-Going Vessels



A Note from the Executive Director

This CAAFI Quarterly newsletter describes CAAFI and related activities that occurred July through September 2025. In this issue, we share industry updates and CAAFI team items of interest and accomplishments.

We appreciate questions, comments, and suggestions at any time. Enjoy!

Steve Csonka and the CAAFI Team

Quick Links

- ⇒ Check out [“What’s New?”](#) for a brief review of noteworthy SAF news from the last quarter, including funding opportunities.
- ⇒ Go to [“Ask CAAFI”](#), a segment that highlights and explains relevant topics that impact the SAF industry.
- ⇒ Go to [“CAAFI Webinars”](#), a segment that highlights and links to webinars that occurred during this period.
- ⇒ See [“CAAFI Team Highlights”](#) for a snapshot of CAAFI work teams’ projects and progress last quarter.
- ⇒ Jump to [“SAF State and Regional Efforts”](#) for a summary of select deployment projects around the United States.

Upcoming Events of Interest

- ⇒ CAAFI / Airline Industry engagements at:
 - [COP30](#), 10-21Nov, Belem, Brazil
 - Scaling Up Canada, 12-14Nov, Ottawa
 - [IATA Energy Forum](#), 18-21Nov, Mexico City
 - [Alternative Fuels and Chemical Coalition \(AFCC\)](#) 5th Annual Biobased Economy & Exhibit, 16-18Nov, D.C.
 - [Aviation Carbon](#), 24-26Nov, London
 - ASTM Winter, 08-11Dec, Houston

What’s New?

We continued to see a mix of good and bad news for the industry over this most recent Quarter, but certainly a lot of activity. We continued to see investment, offtake, commercialization announcements, engagement from new producers, and news regarding efforts in the industry to roll back SAF activities, and what it takes to continue to move forward. Examples include the following:

[Global Feedstock Assessment for SAF Production Outlook to 2050](#)

[Wisconsin bill aims to create \\$210 incentive for proposed SAF project](#)

[IATA Warns of Sustainable Aviation Fuel Shortage and Calls for Government Incentives](#)

[Airlines Band Together to Create Bill Gates-Backed Sustainable Aviation Fuel Fund](#)

[India to begin sustainable aviation fuel production by year-end: ICAO Official](#)

[Airlines will not adopt costly aviation fuel, warns Safa President](#)

[DOE funds 2 SAF research projects](#)

[Promising SAF Production Process Enters ASTM Testing](#)

[Southwest Airlines Sells Off SAF Developer After 16 Months](#)

[Gevo shifts resources to proposed North Dakota SAF project](#)

[Calumet: Montana Renewables SAF expansion progressing on schedule](#)

[LanzaTech awarded significant grant by UK Government to propel SAF production](#)

[Cemvita to build Brazil facility to produce low-carbon oil for sustainable aviation fuel](#)

[Denver terminal joins Avfuel’s growing SAF supply chain](#)

[Phillips 66: Rodeo facility operates at reduced capacity in Q2](#)

[Sustainable Fuel Mandate May Weaken EU Airlines, Deloitte Warns](#)

[Par Pacific, Mitsubishi, and ENEOS to Establish Joint Venture for Renewable Fuels in Hawaii](#)

[Northern Canola Crops Could Takeoff](#)

[Environmentalists Flag Legal Risk of Term 'Sustainable Aviation Fuel'](#)

[Shell, Accenture and Amex GBT Expand SAF Purchasing Platform to Multiple Fuel Suppliers](#)

[FedEx Takes Delivery of SAF from Neste at LAX](#)

[Alcohol-to-Jet Fuel Market Poised for Rapid Growth Amid Global Sustainability Push](#)

[Plan for SAF at PIT Changes, KeyState Out](#)

[IATA Brings Together Airlines and SAF Suppliers on New Procurement Platform](#)

[Mexico Aims for SAF by 2030](#)

[Licella Advances Engineering Phase for SAF Site in Queensland](#)

[45Z Credit Extended Two Years](#)

[Turkey to Set SAF Mandates for Airlines and Suppliers](#)

[Million Air Albany, Albany County Offer SAF](#)

[Boeing Invests in Canadian SAF Ventures](#)

The above are just some of the activities that took place, but many more can be found (e.g. [SAF Magazine](#), [Biofuels Digest](#), [Biofuels International](#), [GreenAir Online](#), , etc.).

Ask CAAFI

Question: What transpired at the North American SAF Conference and Expo?

Answer:

In conjunction with the leadership of BBI International and SAF Magazine, we successfully executed the subject conference in Minneapolis on 22-24Sep, with approximately 300 attendees, and a diverse Expo Hall. Plenary discussions included insightful updates on:

- SAF markets and production
- A summary of the [Greater MSP SAF HUB](#) and some of its engaged partners
- A discussion of the continued expansion of SAF development efforts via additional regional focus activities (e.g. [Massport](#), [Clean Fuels Michigan](#), and the U.S. DOE/INL [Regional Biomass Resource Hub Initiative](#)). These regional activities are likely essential to continued SAF development given the tepid engagement of the current Administration on advanced biofuels.

The remaining two days consisted of two robust parallel tracks focused generally on Policy, Systems and Environmental Strategy, as well as Technology, Production, and Feedstock Innovation.

You can find the full executed agenda [here](#). Photos of the event are [here](#).

We hope to see many of you at the 2026 Event, details of which will be communicated soon.

CAAFI Webinars

⇒ CAAFI Webinars:

- Use of Forestry-based Feedstocks Under the Current Proposed RFS Rule presented by Julie Tuckes and Kristen Bergstrand on July 18th
- The CAAFI Feedstock Readiness Level: Recent Updates and Usage by Kristin Lewis and Rachel Emerson on September 25th
- Click this [link](#) to access slides and/or recordings of previously held CAAFI webinars.

If you have ideas for webinar topics, [please let us know](#).

Other Highlighted CAAFI Activities

Business —

New producers, new suppliers, new customers, and many adjacent participants continue to contact CAAFI for guidance and assistance or asking for introductions to others who can assist with their commercialization efforts. We would like to remind any producer of this resource document, which has just been updated in September in collaboration with our airline partners and A4A: [Guidance for Selling Alternative Fuels to Airlines](#). Additional tools can be found [here](#).

We are very pleased to see this continued level of engagement as we are now at more than 190 companies exploring SAF commercialization. SAF commercialization is accelerating, having reached 135 million gallons of domestic RIN generation in 2025 through September. Further, our latest roll up of intended U.S. SAF production capacity (with identified offtake partners) exceeds 2.0B gallons per year by the end of 2028, with others working quietly in the background on additional capacity.

Certification/Qualification —

The work of the Cert/Qual team is aligned with the activities of ASTM's aviation fuel subcommittee [D02.J0](#). The fuel qualification process is described in the paper "[Qualification of Alternative Jet Fuels](#)," which may be found at the Frontiers in [Energy Research Sustainable Aviation Fuels "Research Topic."](#)

Various qualification activities are in progress:

- ⇒ Methanol-to-Jet Synthetic Paraffinic Kerosene (MtJ-SPK) led by Exxon-Mobil and Honeywell is on ballot at ASTM this semester. Methanol-to-Jet Cyclo Paraffins with Aromatics (MtJ-CKA) is going through OEM review.
- ⇒ Hydrodeoxygenation Synthetic Aromatic Kerosene (HDO-SAK) pathway championed by Marathon is working on addressing few remaining requirements from the OEMs with the target of re-balloting at ASTM for a new D7566 Annex.
- ⇒ Plastics-to-Jet Synthetic Kerosene with Aromatics (PTJ-SKA) pathway promoted by OMV is working with ASTM to develop a separate standard to define the pyrolysis oil that could be used as feedstock to PTJ-SKA Annex they are developing.

- ⇒ Hydroprocessed Esters and Fatty Acids Synthetic Kerosene with Aromatics (HEFA-SKA) pathway advanced by Council of Scientific and Industrial Research The Indian Institute of Petroleum (CSIR-IIP) is finalizing tests requirement resulted from their Phase I review.
- ⇒ In parallel, fully-formulated and paraffinic-only 100% Synthetic Aviation Turbine Fuel Task Groups are working to progress their efforts towards fully synthetic fuels.

Additionally, the interest in co-processing approaches continues and the related work is in progress. Task groups are working on tire pyrolysis oil co-processing and a 'generic' co-processing approach, of which the latter is on ballot at ASTM this semester.

We continued to see increased engagement from petroleum refiners and suppliers who are interested in increasing the types and maximum blend levels for SAF co-processing at existing refinery installations. If you have interest in seeing new pathway approval, or simply getting more engaged in the qualification efforts, consider joining ASTM D02 and participating in its activities. You can also reach us at info@caafi.org for more information on getting involved.

R&D —

- ⇒ The R&D team continues to support the execution of CAAFI's webinar series and coordinates with the CAAFI leadership and certification/qualification teams regarding emerging companies and fuel qualification.
- ⇒ Reach out to [Josh Heyne](#) on CAAFI's R&D team if you have interest in new SAF candidate [pre-screening efforts](#).

State and Regional Initiatives

CAAFI continues to participate in and foster regional development activity with various entities.

While there were some disappointing updates, there continues to be legislative and business development progress in support of SAF development and deployment across the country. Below are a few examples that we're aware of in the past quarter:

⇒ **Alaska**

- August 29 - [Alaska Airlines, Cosmo Oil Marketing sign sustainable aviation fuel sales agreement for Hawaiian Airlines Osaka-Honolulu flights](#)
- July 15 - [Alaska & Hawaiian Airlines Sponsor Spotlight](#)

⇒ **Arkansas**

- July 7 - [Natural State Renewables Partners with Axens and Achieves Major Project Milestone](#)
- [Towards Production of Sustainable Aviation Fuel from Surplus Forest Biomass](#)

⇒ **California**

- August 28 [Promising SAF Production Process Enters ASTM Testing](#)
- August 22 - [U.S. Startup to Turn Dairy Waste into Sustainable Jet Fuel](#)
- August 11 - [The green jet fuel fantasy that never took off - Airline industry's dirty secret](#)
- July 31 - [XCF Global signs indication of intent to acquire West Coast renewable fuel business](#)
- July 23 - [California Low Carbon Fuel Standard amendments take effect](#)

⇒ **Colorado**

- September 23 - [Shell Game Changer Accelerator™ Powered by NREL Announces Five Startups for Seventh Cohort](#)
- July 30 - [New SAF Supply Point in Denver Is the First of Its Kind in the Region](#)

⇒ **Florida**

- August 20 - [Naples Airport wins statewide environmental award for sustainability initiatives](#)

⇒ **Georgia**

- July 31 - [RYAM and GranBio Sign MOU to Explore Cellulosic SAF Project at Jesup Facility](#)

⇒ **Hawaii**

- September 5 - [Alaska Airlines, Cosmo Oil Marketing sign SAF sales agreement for Hawaiian Airlines Osaka-Honolulu flights](#)
- July 25 - [Par Pacific, Mitsubishi, and ENEOS Form Joint Venture for Large-Scale Renewable Fuels Production](#)
- July 15 - [Alaska & Hawaiian Airlines Sponsor Spotlight](#)

⇒ **Illinois**

- August 28 - [Intersection of Agriculture, Technology and Aviation Explored at Global Aerospace Summit In O'Fallon, IL](#)
- July 17 - [Duckworth Discusses Agriculture Priorities with Illinois Corn Growers and Illinois, After Trump Moves Soybean Association](#)

⇒ **Kansas**

- August 16 - [Sustainable aviation fuel boost: Conestoga Energy acquires SAFFIRE Renewables](#)

⇒ **Kentucky**

- July 16 - [Expanding winter canola in the South looking profitable](#)

⇒ **Maine**

- July 15 - [Maine: Retired Air Force Base Takes on New Life as Business Powerhouse](#)

⇒ **Minnesota**

- August 6 - [Sustainable aviation fuel of the future offers farmers the hope they need right now](#)
- August 4 - [Can jet fuel crops clean up our water?](#)

⇒ **Montana**

- August 13 - [Calumet: Montana Renewables SAF expansion progressing on schedule](#)

⇒ **Nebraska**

- September 10 - [US: Opportunities to meet Japan's increasing demand for ethanol and SAF, says Nebraska Governor](#)
- August 17 - [Could sustainable aviation fuel take off for Nebraska agriculture?](#)

⇒ **Nevada**

- July 10 - [XCF plans multiple SAF plants, aims for nearly \\$1 B investment by 2028](#)

⇒ **New York**

- September 29 - [Sustainable travel news from New York Climate Week](#)
- September 23 - [AIRCO Unveils AIRMADE Fuel Plant In NYC To Scale Sustainable Aviation Fuel](#)
- September 23 - [Axios House: Sustainability leaders spotlight resource reuse for energy transition](#)
- July 1 - [Million Air Brings First Continual SAF Supplies to N.Y.](#)

⇒ **North Dakota**

- July 24 - [Gevo Launches Carbon Removal Credit Sales, Scales CCS in North Dakota](#)

⇒ **Oklahoma**

- September 5 - [Sustainable aviation fuels to be studied in House Transportation Committee hearing](#)

⇒ **Oregon**

- September 15 - [PDX gets first renewable jet fuel shipment while Zenith boosts storage in NW Portland](#)
- September 10 - [Delta partners with Shell for first commercial-scale SAF uplift at Portland International Airport](#)

⇒ **Pennsylvania**

- September 12 - [More targeted and faster measures needed to overcome barriers and unlock SAF's full potential, finds PA study](#)
- July 10 - [Plan for Sustainable Aviation Fuel at PIT Changes, KeyState Out](#)

⇒ **Texas**

- September 18 [HIF Global picks Electric Hydrogen tech for Texas e-fuels project](#)
- September 11 [USA BioEnergy selects JM and Honeywell technologies for new SAF facility in Texas](#)

⇒ **Washington**

- August 6 - [Washington state and the federal government are in alignment on the development and adoption of an alternative to jet fuel](#)

⇒ **Wisconsin**

- September 26 – [Wisconsin Mixed Bag: Forestry Revitalization Act promises new facility in Hayward to produce aviation fuel](#)

If you are aware of other scenarios that could be appropriate for a regional development effort, please let us know. For more information, see CAAFI's [State Initiatives](#) page.

Please check the [CAAFI website](#) on a regular basis for more detail on pending activities.

Email peter.herzig@dot.gov with any ideas for CAAFI Quarterly items of interest, caafi.org news suggestions, or inquiries about subscription to the CAAFI Membership group.



Member Update-September 2025

Dear AAE Work Group Members:

The comment period on U.S. Environmental Protection Agency's proposal to rescind the 2009 Endangerment Finding and subsequent GHG standards closed on September 22, 2025. We were pleased to see that multiple AAE members submitted comments that incorporate all of part of our [key points for AAE member comments on EPA Reconsideration of 2009 Endangerment Finding and GHG Emission Standards](#).

While most of AAE commenters noted that the Biden-era greenhouse gas rules for light, medium, and heavy-duty vehicles were infeasible, not everyone endorsed EPA's cart blanche proposal to eliminate the existing GHG standards. The Alliance for Automotive Innovation for example stated that

- *“Automakers and suppliers in the U.S. are increasingly being forced to navigate rapid and dramatic swings in vehicle emissions policy from one administration to another administration. Since years-long design, development, and production cadences necessitate investments in technology and production capacity years in advance, each such change puts billions of dollars of capital investment at risk. The Proposed Rule represents yet another significant change in approach that the industry will have to navigate. The approach also has the potential to further amplify the severity of policy swings in future administrations”.*

To address the challenges that these swings create for automakers, AAI went on to urge EPA to:

- *“(a) document in the record why the present standards are not appropriate; and (b) develop and implement revised GHG standards as an alternative or backstop to the Proposed Rule. Such a contingency plan will be critical if motor vehicle GHG standards are retained or reinstated in some way. Revised standards could be issued through an interim final rule or other rulemaking instrument pending a final action on the Proposed Rule. EPA should consider a rule that maintains the standard from a recent model year until such time that a full notice and comment rulemaking could be conducted to replace the standards with ones that produce reasonable and achievable reductions in GHG emissions and that can be reasonably achieved by manufacturers offering a broad range of vehicle powertrain technologies, including internal combustion engine vehicles.”*

Several AAE members including the Illinois and Missouri Corn Growers Association, POET and Growth Energy noted how increasing blending rates of renewable and low carbon fuels like ethanol will produce outcomes that align with the Trump administration consumer cost savings, national security and U.S. job creation priorities. Others highlighted how higher ethanol blends will reduce GHG and toxic emissions.

Pearson Fuels and Growth Energy both called for the re-establishment of appropriate credit to automakers for the production of flex-fuel vehicles.

While likely outside the scope of this proposed rule AAE members also called on EPA to improve fuel quality by replacing toxic benzene, toluene, ethylbenzene, and xylene (BTEX) aromatics with ethanol. The American Free Enterprise Chamber of Commerce (AmFree) along with the Missouri and Illinois Corn Growers Associations advocated that high octane fuel standards and the consideration of lifecycle emissions are a “lawful and superior path to reducing emissions”.

- *“We urge EPA to use its unambiguous authority under Section 211(c) of the Clean Air Act to set a minimum fuel standard of 95 Research Octane Number (“RON”). A higher-octane fuel, achieved by blending more homegrown, renewable ethanol, would immediately unlock the next generation of high-compression, ultra-efficient engines. We also urge EPA to use its authority to properly consider the lifecycle emissions of fuels by embracing alternatives—such as lower carbon-intensity fuels, biofuels, and other advancements—that provide multiple technology-neutral options for reducing motor vehicle GHG emissions. Improving fuel quality in these ways would immediately improve the efficiency of and reduce the emissions of the more than 281 million internal combustion engine vehicles on the road today and the 100 million more projected to be built over the coming decades. This technology-neutral approach is the superior path to lowering consumer fuel costs, strengthening U.S. energy security, alleviating trade imbalances, and achieving immediate, real-world reductions in emissions that help, rather than hurt, ordinary Americans.*

If you have not yet sent us the comments you submitted to EPA please do so. EPA is currently loading comments that were filed onto their web site. We’ll send you a link once it’s up. In the meantime below are links of comments we have received:

- [AAI Comments on EPA GHG](#)
- [Corn Growers and Am Free Comments on EPA GHG](#)
- [Growth Energy Comments on EPA GHG](#)
- [NCGA comments on EPA GHG](#)
- [Pearson Fuels Comment on EPA GHG](#)
- [POET comments on EPA GHG](#)
- [Stellantis Comments on EPA GHG](#)
- [Toyota comments on EPA GHG](#)

SRE Exemptions

On September 16, 2025, EPA announced a supplemental proposed rule that takes into consideration the expected impacts of small refinery exemption decisions issued as part of the August 2025 SRE Decisions Action. Based on this information, EPA is co-proposing additional volumes representing complete (100 percent) reallocation and 50 percent reallocation for SREs granted in full or in part for 2023 and 2024, as well as those projected to be granted for 2025, as part of the ongoing RFS rulemaking. EPA is also providing more information on its projection of SREs to inform the calculation of the 2026 and 2027 percentage standards.

- [Proposed Renewable Fuel Standards for 2026 and 2027: Supplemental Notice \(pdf\)](#) (268 KB, published September 18, 2025)

- [Proposed Renewable Fuel Standards for 2026 and 2027](#)
- [August 2025 SRE Decisions Action](#)

Fuel Messaging Study

The AAE Working Group has partnered with Strategic Vision (SV) to conduct primary research aimed at understanding responses to proposed messaging statements intended to encourage consumer interest in broader ethanol adoption in vehicle fuels. This project consists of both qualitative one-on-one in-depth interviews (IDIs) of Consumers and Stakeholders, and an online Consumer quantitative survey to provide statistical significance to the insights of the qualitative work. SV worked with contact lists provided by AAE WG to recruit stakeholders in the domains of fuel marketers, policy makers, regulators, and automotive OEMs. The full sample of Consumer qualitative one-on-one interviews (n = 36) and the Consumer online survey (n = 450) have been completed. To supplement the qualitative research component of the study, SV is inviting OEM participants attending their upcoming research convention (ReCon) to participate in a focus group review during the event to identify any concerns from an OEM perspective. We expect to receive the final research report or SV before the end of October.

Update on Petitions

The following is the latest readout from BGA PLLC on the petitions we are tracking:

1. *Diamond Alternative v. EPA* (D. Cir.) Challenge to ACC I waiver on remand from the Supreme Court. Will likely be held in abeyance for now.
2. *California v. EPA* (N.D. Cal.). California challenge to the Joint Resolution disapproving ACCII waiver, ACT waiver, and Omnibus NOx waiver. U.S. DOJ filed a strong motion to dismiss a few days ago. Awaiting California's opposition. Hearing on intervention motions in late October.
3. *AmFree v. EPA* (9th Cir.). ACC II waiver case – Government has moved to dismiss the petitions on grounds of mootness in light of Joint Resolution disapproving ACCII, which petitioners supported. California has cross-moved to hold the case in abeyance. We have opposed. Awaiting a decision from the Court's motions panel. California's reply to oppositions is due in October, so we expect a decision in late October.
4. *Iowa v. Granholm* (8th Cir.). Court invalidated the PEF for EVs, including the fuel-content factor.
5. *California v. NHTSA* (1st Cir.). Blue states and eNGOs filed a challenge to NHTSA's interpretive rule. Intervention pending. Proposed repeal of CAFE rules at OIRA.
6. *CFDC v. Kessler* (D. Minn). Minnesota district court has revived a challenge to Minnesota's adoption of ACC I.
7. *NRDC v. NHTSA* (D.C. Cir). NHTSA MY 2024-2026 CAFE standards – Cases in indefinite abeyance. (NHTSA NPRM at OIRA).
8. *Texas v. EPA* (D.C. Cir.). EPA GHG standards for MY 2023-2026 and later light-duty vehicles – Cases in indefinite abeyance.
9. *Kentucky v. EPA* (D.C. Cir.). EPA multi-pollutant rule – Cases in indefinite abeyance.
10. *MCP No. 189* (6th Cir.) NHTSA MY 2027-2031 CAFE standards and MY 2030 -2035 heavy-duty pickup and van standards. Cases in indefinite abeyance

Reading/Viewing/Listening

- [Renewable Fuel Standard Volumes Rule Likely to Face Delay ...](#) DTN
- [Trump urges the world to abandon climate fight - Governors' Biofuels Coalition](#)
- [The push for year-round, nationwide E15 continues in D.C.](#) Brownfield – September 23, 2025

- [The 4-alarm fire in farm country](#) Prairie Farmer – September 23, 2025
- [Trump to world: Green energy is a scam and climate science is from ‘stupid people’](#) New York Times – September 23, 2025
- [National survey: Americans strongly support year-round access to E15](#) RFA News Release – September 17, 2025
- [Industry expects CARB to issue interim guidance for E15 sales in state](#) Inside EPA – September 25, 2025
- [Was it all a ruse? Don’t believe everything you read and hear](#) Transportation Energy Institute – September 2025

Thank you for your participation in and contribution to the work of AAE.

Best Regards,

Michael Moore
AAE Co-Chair

Chris Bliley
AAE Co-Chair



Member Update-October 2025

Dear AAE Work Group Members:

With the federal government shutdown still in effect, most activity in the agencies we work with has been paused. How long this goes on remains a question of significant speculation and until a compromise is forged, we don't expect to see any major decisions reached on SRE exemptions, nationwide sales of E15 or the U.S. Environmental Protection Agency's proposal to rescind the 2009 Endangerment Finding and GHG standards.

GHG Endangerment Finding

Of the more than 500,000 comments EPA received on their endangerment finding and GHG rule, only about 2% have been posted on the agency's web site. As such, there are still a lot of unknowns in terms of what the commenters had to say. What we do know and what has been reported by the press, is that [E.P.A.'s Plan to Kill a Major Climate Rule Is Worrying Business Leaders](#). If the repeal goes through and the federal government stops regulating GHG emissions, automakers, utilities, oil and gas stakeholders and others fear that this could open the door for states to create their own regulatory requirements, which would in turn create even more regulatory uncertainty if individual states or groups of states create their own standards.

Nationwide Consumer and Fuel Retailer Choice Act (E15)

Disagreements among ethanol, feedstock and oil stakeholders over Renewable Fuel Standard (RFS) Renewable Volume Obligations (RVOs), small refinery exemptions, and emergency waivers has led the American Petroleum Institute to drop its support for the Nationwide Consumer and Fuel Retailer Choice Act. While this development is disappointing, efforts to forge consensus with liquid fuel stakeholders continue, as do efforts to secure passage of legislation allowing year-round sales of E15 before the end of the year.

Fuel Messaging Study

Strategic Vision (SV) is wrapping up their message research study, and we expect to receive their final report in the next few days. As a reminder, the research is aimed at understanding responses to proposed messaging statements intended to encourage consumer interest in broader ethanol adoption in vehicle fuels. This project consists of both qualitative one-on-one in-depth interviews (IDIs) of Consumers and Stakeholders, and an online Consumer quantitative survey to provide statistical significance to the insights of the qualitative work. Be on the lookout for a webinar announcement where the findings will be shared.

Update on Petitions

With the government shutdown, there are no new updates on pending litigation. Following is the latest readout from BGA PLLC on the petitions we are tracking:

1. *Diamond Alternative v. EPA* (D. Cir.) Challenge to ACC I waiver on remand from the Supreme Court. Will likely be held in abeyance for now.
2. *California v. EPA* (N.D. Cal.). California challenge to the Joint Resolution disapproving ACCII waiver, ACT waiver, and Omnibus NOx waiver. U.S. DOJ filed a strong motion to dismiss a few days ago. Awaiting California's opposition. Hearing on intervention motions in late October.
3. *AmFree v. EPA* (9th Cir.). ACC II waiver case – Government has moved to dismiss the petitions on grounds of mootness in light of Joint Resolution disapproving ACCII, which petitioners supported. California has cross-moved to hold the case in abeyance. We have opposed. Awaiting a decision from the Court's motions panel. California's reply to oppositions is due in October, so we expect a decision in late October.
4. *Iowa v. Granholm* (8th Cir.). Court invalidated the PEF for EVs, including the fuel-content factor.
5. *California v. NHTSA* (1st Cir.). Blue states and eNGOs filed a challenge to NHTSA's interpretive rule. Intervention pending. Proposed repeal of CAFE rules at OIRA.
6. *CFDC v. Kessler* (D. Minn). Minnesota district court has revived a challenge to Minnesota's adoption of ACC I.
7. *NRDC v. NHTSA* (D.C. Cir). NHTSA MY 2024-2026 CAFE standards – Cases in indefinite abeyance. (NHTSA NPRM at OIRA).
8. *Texas v. EPA* (D.C. Cir.). EPA GHG standards for MY 2023-2026 and later light-duty vehicles – Cases in indefinite abeyance.
9. *Kentucky v. EPA* (D.C. Cir.). EPA multi-pollutant rule – Cases in indefinite abeyance.
10. *MCP No. 189* (6th Cir.) NHTSA MY 2027-2031 CAFE standards and MY 2030 -2035 heavy-duty pickup and van standards. Cases in indefinite abeyance

Reading/Viewing/Listening

- [Pressure builds on Congress to end the shutdown, but a quick breakthrough appears unlikely](#) Associated Press – October 27, 2025
- Thune says he will engage 'pretty soon' with Democrats about ending shutdown. E&E News, [10/30/25](#)
- [Global CCS Institute report highlights ethanol, bioenergy CCS project development](#) Ethanol Producer – October 23, 2025
- [Ford is halting F-150 Lightning production to focus on more profitable gas and hybrid trucks](#) Electrek – October 23, 2025
- EPA to furlough 89% of workforce if shutdown drags into November, Lee Zeldin says. The New York Post, [10/30/25](#)
- The nation's energy dominance falters. High Country News, [10/30/25](#)

Thank you for your participation in and contribution to the work of AAE.

Best Regards,	
Michael Moore	Chris Bliley
AAE Co-Chair	AAE Co-Chair

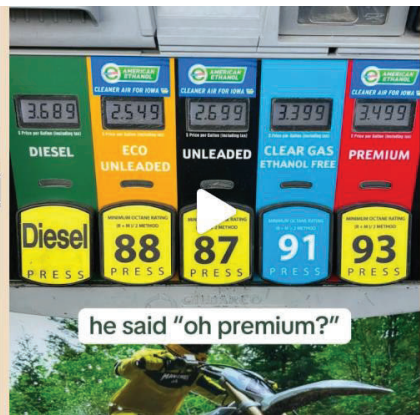
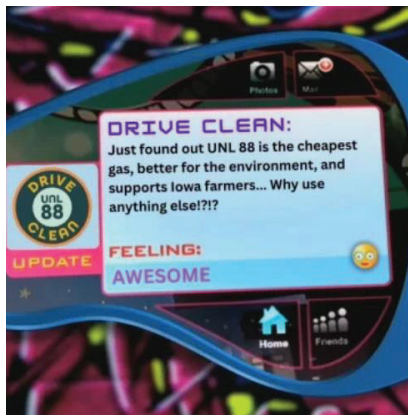
4e. USDA/DOE Programs

5a. Ethanol Promotions Committee

1. DRIVE CLEAN Nina De Grandis is our intern for the fall of 2025. She will be managing the campaign with social media posts, videos, and graphics. We are working on improving the website with an updated E15 locations map, and a “teacher resources” tab with teaching materials.



Nina De Grandis is our Marketing Intern and will be staying with us through the Spring of 2026. Nina is a senior at Iowa State University studying public Relations. She will be managing the DriveClean campaign with social media posts, videos, and graphics.



Instagram

Month/ Year	Count (# followers)	Post (#)	Likes (#)	Comments(#)	Total(Likes+Comments)	Engagement Rate (Total L+C)/ followers x 100
Jan-25	420	11	122	2	124	29.52380952
Feb-25	418	7	61	0	62	14.83253589
Mar-25	425	6	42	9	51	12
Apr-25	425	11	59	0	59	13.88235294
May-25	425	17	127	2	129	30.35
Jun-25	425	16	309	5	314	73.88
Jul-25	425	17	139	0	139	32.71
Aug-25	425	17	148	4	152	35.76
Sep-25	430	13	119	0	119	27.67
Oct-25	432	15	205	1	206	47.69
Nov-25	429	12	138	1	139	32.4

TikTok

Month/ Year	Count (# followers)	Post (#)	Likes (#)	Comments(#)	Total(Likes+Comments)	Engagement Rate (Total L+C)/ followers x 100
Jan-25	198	6	193	11	204	103.030303
Feb-25	197	2	35	3	38	19.2893401
Mar-25	203	3	91	0	91	44.82758621
Apr-25	203	7	86	5	91	44.82758621
May-25		9	209	4	213	
Jun-25		6	91	2	93	
Jul-25		8	172	6	178	
Aug-25	223	9	92	0	92	
Sep-25	223	4	34	8	42	18.83
Oct-25	223	6	250	6	256	114.8
Nov-25	224	5	180	9	189	84.38

2. Promotion events

Kardes E15 Pump Promotion October 17



CHOOSE THE BEST FUEL FOR YOUR VEHICLE

E85

70-85% ethanol blend for flex fuel vehicles (FFV). The cleanest & most affordable option for FFVs, benefiting your wallet & the environment. Check your owners' manual before fueling with E85.

UNLEADED
88
E15

15% ethanol blend approved for 2001 & newer vehicles. The lowest cost, lowest carbon fuel choice for over 96% of cars on the road today! Should not be used in small engines.

SUPER UNLEADED
87
E10

10% ethanol blend approved for use in all vehicles, & the most commonly used fuel in the U.S. Also approved for small engines such as lawn mowers, boats & motorcycles.

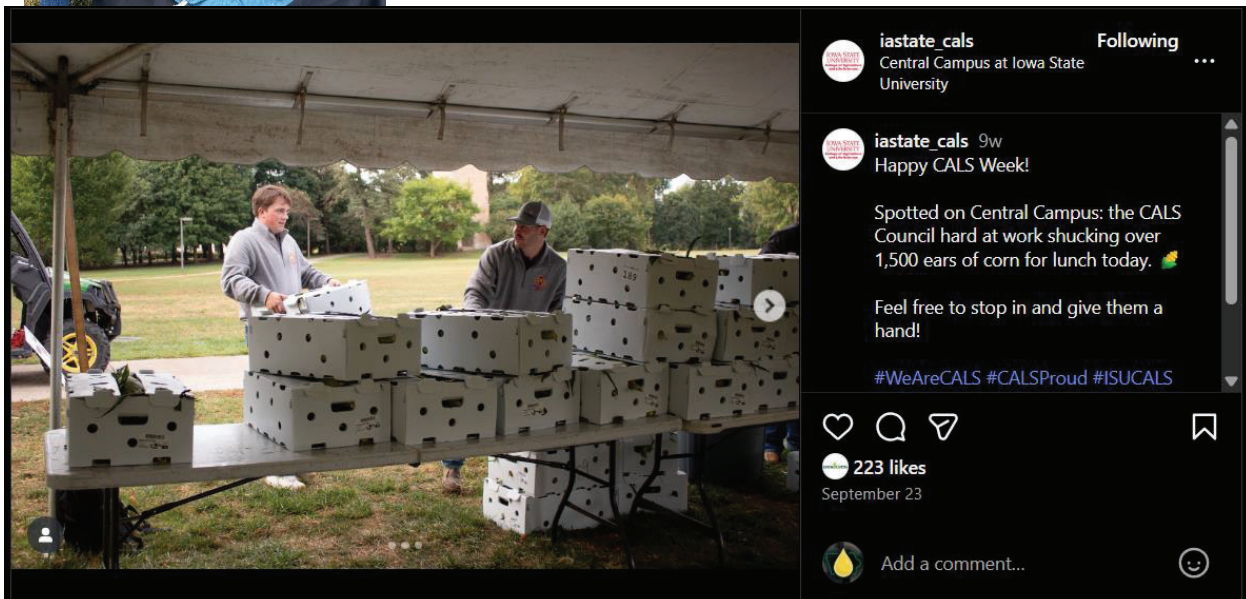
91

Typically only recommended for sports cars or luxury vehicles. The most expensive fuel available. Offers little to no benefit for standard cars and trucks.

College of Agriculture and Life Science Week September



- 1,500 Ears of Corn
- Average of 400 students/day



3. IRFA is supporting RFA with a new E15 campaign in California. The campaign consists of meetings and workshops. The campaign kicks off at the California Summit on September 2-4 in San Diego.

California E15 Market Prep – Where we are today

- We also have 8 other workshops scheduled across the state at this point, scheduling more each week.
- RSVP system is live, retailers already registering!
- These workshops include CFCA staff, other retailers, equipment experts, California consultants and other SMEs.
- Website is operational, slide deck is done, materials being printed - work is well underway!
- Work also continues with CARB.
- Another example, meeting this afternoon with California Weights & Measures.



* PLEASE TREAT AS CONFIDENTIAL

California E15 Market Prep – Where we are today

- RFA partnered with the California Fuels & Convenience Alliance (CFCA), largest statewide trade association representing independent wholesale and retailer gasoline marketers and convenience stores in California to launch this effort and will do so at their Summit September 2-4 in San Diego.
- RFA will exhibit, sponsor and host three workshops during the event that will have more than 1,500 fuel retailers in attendance.
- First workshop will be invite only by CFCA, second two will be open to all attendees.
- Focus will be on E15, RFA itself will be silent. New materials, booth, etc.



* PLEASE TREAT AS CONFIDENTIAL

California's E15 legislation is in a current status of immediate authorization, but final regulations are pending. Governor Newsom signed Assembly Bill 30 on October 2, 2025, allowing the sale of E15 to begin immediately. However, the California Air Resources Board (CARB) is still completing its evaluation and will release a rule making proposal in late 2026, with full regulations expected to take effect in early 2027.

4. IRFA is supporting Growth Energy with their In App UNL88 Promotion. They are promoting customers to fill up with UNL88 and able to track future fuel purchases within the App for Casey's and Upside.

Promotion Results				
Group	Pre	During	Post	E15 Gallons Sold
Group 1: NOT UNL88 Customer	X	✓	X	51,097 (59%)
	X	✓	✓	35,613 (41%)
Group 2: PRIOR UNL88 Customer	✓	✓	X	37,875 (13%)
	✓	✓	✓	254,640 (87%)

5b. Biodiesel Promotion Committee

1. On Farm Biodiesel Credit Program was developed to provide a credit to farmers who use B11 or B20 in their bulk tank. The credit is 25-cents per gallon for B11 and 50-cents per gallon for B20 and above. During the August Biodiesel Committee Meeting call, it was discussed if the funding for this program should continue or go to another promotion. The committee voted in favor of continuing this program through the end of 2025.

2025 On Farm Biodiesel Credit Program Status

\$15,000 rollover from 2024

As of 12/1/25

- 7 Farmers
- 14,584 total gallons of biodiesel
- B20 gallons = 3,689
- B10 gallons = 10,895

Total amount of credit = \$3,370

2. Biodiesel Geofencing Campaign promoting On Farm Biodiesel Credit. This campaign targeted

Earn \$500 Cash for filling up with a Biodiesel Blended Fuel!



**Earn \$500 Cash
for filling up with a
Biodiesel Blended Fuel!**

Affordable • Renewable • Usable



Learn More



**Earn \$500 Cash
for filling up with a
Biodiesel Blended Fuel!**

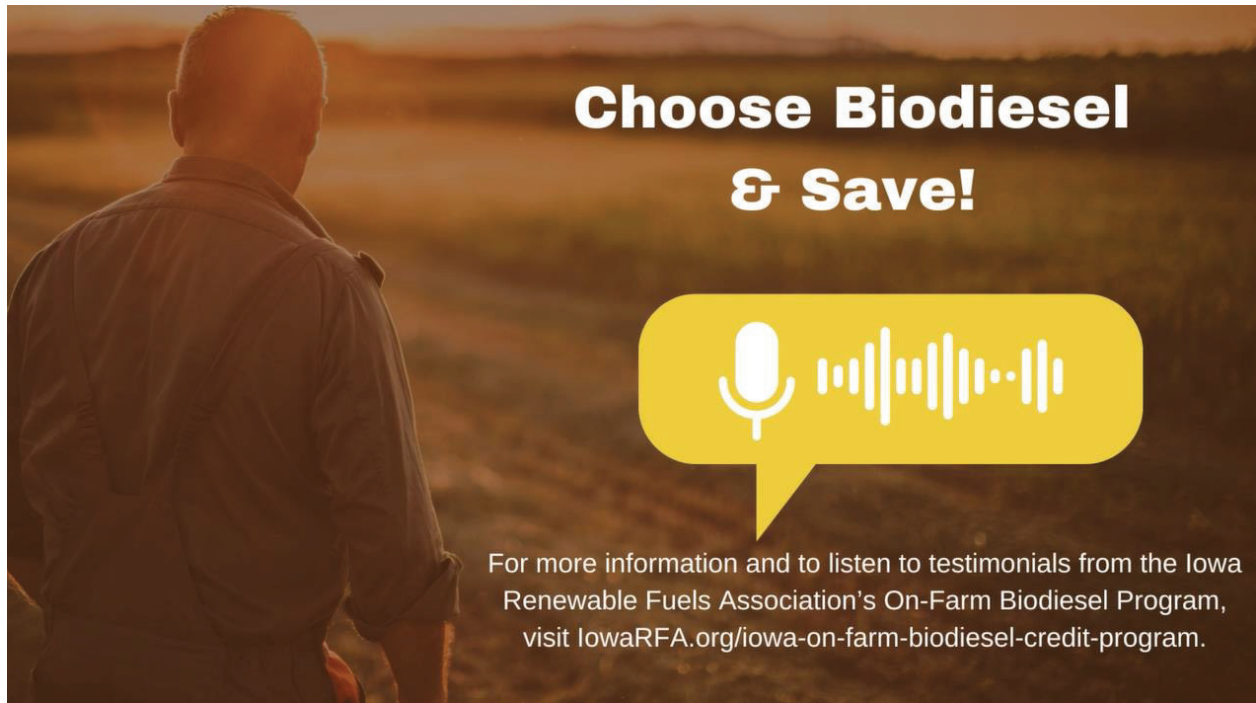
Learn More



Affordable • Renewable • Usable



**Iowa Renewable
Fuels Association**



We had projected 82,444 impressions and the Geo-Fence display was pretty spot on; with the YouTube over-delivering.

Overall we delivered 120,000+ impressions with 104 clicks

Targets:

Farmers

JD/Case Equipment owners

Ag online publications

Campaign Report

Date

Current Aug 1, 2025 - Oct 31, 2025

Compare to Jul 31, 2025

Market

Select...

Tactic

Select...

Campaign

Select...

Topline Performance

Impressions

120,276 +100.00%

Clicks

104 +100.00% (104)

CTR

0.09 % +0.00% (0.00 %)

Conversions

0.00 +0.00% (0.00)

Trending Performance

Impressions Clicks



Performance Breakdowns

Channel	Impressions	Clicks	CTR	Conversions
YouTube	67,048	29	0.04 %	-
Display	53,228	75	0.14 %	-
Total	120,276	104	0.09 %	-

1 - 2 of 2 items

Display

Impressions

53,228 +100.00%

Clicks

75 +100.00% (75)

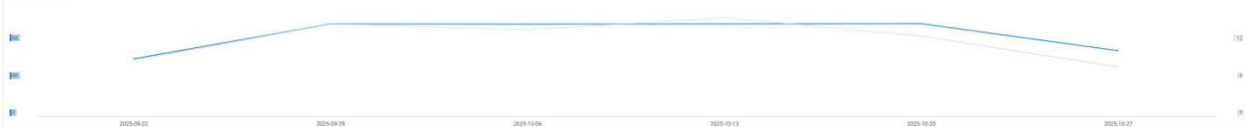
CTR

0.14 % +0.00% (0.00 %)

Conversions

0.00 +0.00% (0.00)

Impressions Clicks



Display Performance

Campaign (N) (g)	Tactic (N) (g)	Channel (N) (g)	Impressions	Clicks	CTR	Conversions Weighted Actions (DCM12)
Bio Diesel 2025	AGF	Display	53,228	75	0.14 %	0.00
Total			53,228	75	0.14 %	0.00

1 - 1 of 1 items

Display Creative Performance

Creative Name	Campaign (N) (g)	Impressions	Clicks	CTR	Conversions Weighted Actions (DCM12)
728 x 90.png	Bio Diesel 2025	8,486	21	0.25 %	0.00
320 x 50.png	Bio Diesel 2025	33,346	39	0.12 %	0.00
300 x 250.png	Bio Diesel 2025	10,091	10	0.09 %	0.00
300 x 600.png	Bio Diesel 2025	865	5	0.58 %	0.00
Total		53,228	75	0.14 %	0.00

2. IRFA completed a study with New Century FS and Humboldt Community School District showing the benefits of using biodiesel in existing school buses. We developed a handout and short report showing the findings of the study was given to each of the attendees of the IPTA Conference. We would be finalizing a press release/announcement of the findings.



Biodiesel in School Bus Fleet: Results from the Humboldt Fleet Pilot Project

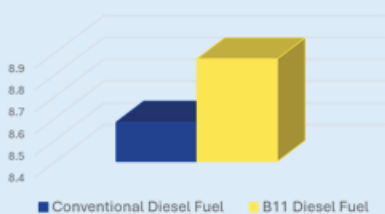
IC Bus CE Series Bus - 2021

- New in August 2020
- Conventional diesel from new to 2022
- Switched to B11 diesel fuel in August 2022
- B11 used from then to now.

The conventional diesel period of operation was compared to the B11 diesel fuel period of operation by examining data from the bus onboard computer.



3.4% Increase In Overall Fuel Economy
(Miles/Gallon)



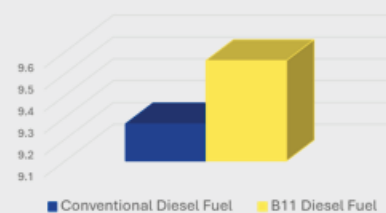
Overall Fuel Economy – 3.4% increase!

The total miles driven and total fuel used for both the conventional and B11 diesel fuels were examined. The 16,977.13 miles driven before the fuel changed yielded an average economy of 8.58 miles/gallon. After the change, the 20,900.77 miles driven on B11 yielded a 3.4% increase with an average fuel economy of 8.87 miles/gallon.

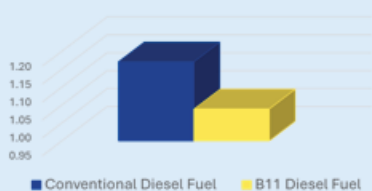
Moving Fuel Economy – 3.1% increase!

The question with the overall fuel economy is that idling, PTO, or aftertreatment fuel used can impact the number. In this comparison, we removed the fuel volume the computer records as used for idling, PTO, and aftertreatment. This gives us a straight comparison of efficiency while the bus is moving. Again, we see an over 3% improvement in fuel economy.

3.1% Increase In Moving Fuel Economy
(Miles/Gallon)



11.2% Reduction In Aftertreatment Gallons
Used
(Gallons/100 Hours)



Aftertreatment – 11.2% Reduction!

For DPF regenerations, fuel is used to ignite and raise the temperature to burn the soot built-up on the filter. After changing to the B11 diesel fuel, the computer is recording less fuel per hour of operation is needed for regeneration. This is due to a reduction in regenerations and/or shorter burns needed to remove the built-up soot on the DPF.

3. School Bus Biodiesel Incentive Program

IRFA is developing an incentive program for school districts. Criteria may include:

- Use Biodiesel in school buses for reduction in particulate emissions and greenhouse gas emissions.
- All school districts in Iowa are eligible.
- Must blend B11 in warm months, can drop to B5 in winter months
- Need to be able to verify usage of biodiesel
- Funds would be based on the number of buses or gallons used. School would get money upfront.
- Upon execution of agreement an initial payment will be delivered.
- Upon completion of one-year program and submission of required usage and data, a final payment will be disbursed.

This is in the development stage but we plan to have some conversations with districts to see what it would take to give biodiesel a try.

Community school districts considering participation in program

Sioux City
Ft. Dodge
Denison
Carroll
Spencer
LeMars
Boone
Perry

*** if participating in the program we offer a sponsorship to the Clean Fuels Conference in January 2026.

Draft School Bus Incentive Contract

New Century FS & IRFA Biodiesel in School Bus Fleet Project

Between:

New Century FS and the Iowa Renewable Fuels Association (IRFA) hereinafter referred to as “*Program Sponsors*”, and
[School District Name], hereinafter referred to as “*Participant*.”

Effective Date: [Insert Start Date]

Term: 12 months

1. Purpose

The purpose of this Agreement is to establish a partnership between the Program Sponsors and the Participant to promote the use of biodiesel in school transportation fleets. The Participant agrees to use biodiesel fuel for one (1) year as part of this program.

2. Program Details

- The Participant will utilize **biodiesel (B5 in the winter and B20 in the summer)** in its designated school buses or fleet vehicles for the duration of this Agreement.
- The Program Sponsors will provide technical support, promotional materials, and reporting guidance as needed.

3. Payment Terms

- Upon execution of this Agreement, the Program Sponsors will provide the Participant with an **initial payment of \$[amount]** to support program participation and any related fuel transition costs.
 - Upon successful completion of the one-year program, and submission of the required usage and performance reports, the Participant will receive a **final payment of \$[amount]** within 30 days of approval by the Program Sponsors.
-

4. Reporting Requirements

The Participant agrees to:

- Maintain fuel purchase and usage records throughout the program period.
 - Submit a summary report at the conclusion of the one-year term documenting fuel volumes used, vehicle performance, and any feedback on biodiesel use
-

5. Publicity

The Program Sponsors may reference the Participant's involvement in promotional or educational materials, with prior written approval from the Participant.

6. Entire Agreement

This document constitutes the full understanding between the parties and supersedes any prior agreements or communications.

IN WITNESS WHEREOF, the parties have executed this Agreement as of the Effective Date.

Program Sponsor:

Name: _____
Title: _____
Signature: _____
Date: _____

Program Sponsor:

Name: _____
Title: _____
Signature: _____
Date: _____

Participant (School District):

Name: _____
Title: _____
Signature: _____
Date: _____

Iowa Renewable Fuels Association
Biodiesel Promotion Committee Minutes

August 28, 2025

Draft

Meeting was called to order by Lisa Coffelt at 2:03 pm.

Members Participating:

Chevron Renewable Energy Group	Steve Klein	
Iowa Soybean Association	Karen Long	
New Century FS	Jason Stauffer	
Iowa Renewable Fuels Association	Lisa Coffelt	Marketing Director

IRFA Anti-Trust Policy

Coffelt reviewed IRFA's Anti-Trust Policy Information.

"IRFA and its officers, directors, and employees fully support and intend to comply with all applicable federal and state antitrust laws and shall not engage in anti-competitive conduct or practice, nor allow IRFA to be used by any member or other party for anti-competitive or unlawful purpose, including but not limited to the following kinds of prohibited conduct:

Any discussions or effort to directly or indirectly fix, raise, lower, control, recommend, suggest, or maintain prices on products or inputs.

Any contract, combination, conspiracy, discussions, or effort to divide or allocate markets or customers.

Any discussions or effort to engage in any boycott or considered refusal to deal.

Any discussions or effort through unsanctioned industry standards, restrictions, or any other method, to injure the business or trade of anyone.

Minutes will be kept of all meetings of the Board of Directors, the Executive Committee and Standing Committees. These minutes shall summarize accurately and concisely the action taken at the meeting."

- On-Farm Biodiesel Credit Program

Coffelt gave a brief update on number of credits given to farmers to date in 2025. At the August Committee Meeting, there was a consensus to continue the program until the end of 2025, promote the program to those who have participated at the B11 level, as well as new farmers. Coffelt reviewed the results from the geofence campaign with digital ads targeting farmers, equipment owners, ag online publications and previous farmers who had received a grant for B11. Unfortunately, there was no additional applicants to the program. The remaining funds will roll over to 2026. Discussion continued.

- School Bus Biodiesel Incentive Program

At the August meeting, there was a consensus to move forward and determine what the monetary amounts would be to help public school systems move forward with using biodiesel. The concept is to give the school districts funding to “sign on” to the program and if they continue to participate for a year, the districts will receive additional funding after the program. Stauffer gave brief update to efforts toward Ft. Dodge and Sioux City participation in the program. Discussion continued.

- Target First Student Transportation

First student is a full service transportation company that supports school district with school bus/transportation needs. Stauffer noted an increase in school systems turning to First Student for bus needs. Discussion continued.

There was a consensus that IRFA will research a contact and look to set up a meeting to discuss use of biodiesel in existing buses.

Coffelt adjourned the meeting at 2:36 P.M.

5c. Membership Committee

Iowa Renewable



Fuels Association

Producer Membership Roster

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Iowa Renewable



Fuels Association

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5d. IRFA HR Committee

Iowa Renewable Fuels Association
Human Resources Committee Minutes
December 2, 2025

DRAFT

Meeting was called to order at 10:00 am.

Members participating:

Gevo, Inc.
SIRE Ethanol
Three Rivers Energy
Western Iowa Energy
Homeland Energy
Lakeview Energy
Golden Grain

Bobbie Grey
Denae Reeves
Toni Trowbridge
Ronda Bohm
Braden Yauk
Marisol Reese – Lowe
Brooke Peters

Others Participating:

Lisa Coffelt
Elissa Holman

Iowa Renewable Fuels Association
Dickinson Bradshaw

Drug Policies v Drug Testing Policies

Elissa Holman with Dickinson Bradshaw presented pros and cons to both drug policies and drug testing policies. See attached presentation.

Meeting was adjourned at 10:31 am.

Drug Policies v. Drug Testing Policies

An Informed Approach to Drug Related Policies in the Workplace



Disclaimer:

- Marijuana remains illegal under the Federal Controlled Substances Act and as such, any information contained herein is provided for the sole purpose of helping navigate the complex legal framework surrounding the drug and drug testing policies in the workplace.
- Although many states' laws have decriminalized the use of marijuana or cannabidiol for various purposes, federal law still prohibits the cultivation, possession and/or sale of marijuana and related cannabis products. Therefore, nothing in this presentation is intended to educate you regarding violation of federal law.

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Distinct Approaches

- A clear approach to managing substance use at work can involve two distinct but related tools: a comprehensive drug and alcohol policy and a separate drug testing policy.
- A company can choose to use both of these tools, or one of them based on what works best to meet the company's needs.



Overview and Key Differences

- A **drug and alcohol policy** sets expectations for workplace conduct, prohibits impairment, explains reporting and discipline, and outlines accommodation processes.
- A **drug testing policy** governs when and how the employer will collect and analyze biological testing specimens, such as urine, hair, or blood. It governs under what circumstances testing may occur, how results are managed, and consequences of positive results.



Drug Policy Pros

Clarity and Expectations	Provides clear rules on impairment, use, reporting; supports consistent discipline
Safety Risk Management	Promotes training and hazard controls
Legal Compliance	Can be tailored to comply with disability/accommodations
Employee Relations and Culture	Trust based
Cost Effective	Less expensive than implementing a testing program.



Drug Policy Cons

Clarity and Expectations	May be hard to prove impairment without objective evidence. The language of the document may give rise to disputes over interpretation and claims for discrimination if the policy is not uniformly applied to all employees.
Safety Risk Management	Relies on reporting and observation of others.
Legal Compliance	Harder to defend adverse employment decisions if evidence is weak
Employee Relations and Culture	Trust based; employees may ignore the policy if it is weak.



Drug Testing Policy Pros

Clarity and Expectations	Defines objective procedures and triggers for discipline that support consistent enforcement.
Safety Risk Management	Large deterrence effect.
Legal Compliance	Easier to defend adverse employment decisions because there is evidentiary support.
Employee Relations and Culture	Perceived as fair and objective.
Insurance	Drug testing policies may reduce insurance costs



Drug Testing Policy Cons

Clarity and Expectations	Reliance on testing can take the place of meaningful training and supervision
Safety Risk Management	Misleading test results.
Legal Compliance	High degree of legal complexity. (explored on next slide)
Employee Relations and Culture	Can damage morale and trust.
Cost	More expensive than a drug policy.
Documentation and Defensibility	Procedural missteps can undermine discipline



Drug Testing Policy Cons: Legal Pitfalls

Accommodations	Risks ADA issues
Confidentiality	Lack of meaningful safeguards can create privacy claims.
Procedural Pitfalls	Employers who implement a drug testing policy must comply with Iowa Code § 730.5.
Civil Liability	Iowa Code § 730.5 may be enforced through costly civil remedies.
Insurance Carriers	Employment Practices Liability Insurance: ❖ Company vulnerable if testing policy is poorly designed. ❖ Can indirectly raise costs.



Practical Steps for IA Employers

- ❖ Determination of which policy (or both) best fits operational needs of company
- ❖ Statutory compliance if opting for drug testing policy
- ❖ Recognize potential impact on workplace culture
- ❖ Recognize potential vulnerabilities of both options

5e. IRFA PAC Committee

IRFA PAC Report

Beginning Balance: **\$131,738.48 (7/1/2025)**

Checks

- None

Deposits

- Siouxland Energy PAC \$2,446.00 (7/3/25)
- PAC Auction with Mulligans \$27,980.00 (9/11-25)

Current Balance: **\$162,164.48 (6/11/2025)**

Past PAC Auction Fundraising

2024	\$30,000
2023	\$54,000
2022	\$43,000
2021	\$36,000

5f. Co-Products Committee

Upcoming Events:

23rd International
Marketing
Conference

&

66th Annual
Membership
Meeting

PANAMA CITY, PANAMA | FEB. 11-13, 2026



February 11-13, 2026 – The 23rd International Marketing Conference and 66th Annual Membership Meeting >

Due to uncontrollable circumstances in the new administration, we have had to make the tough decision to cancel this year's symposium.

30th Annual Distillers Technology Symposium

Downtown Indianapolis Marriott
Indianapolis, IN

April 13-15, 2026

Take advantage of sponsorship and exhibiting to increase the awareness of your company and value of your products.



5g. Iowa Monarch Conservation Consortium

6a. 2026 Biofuels Science and Sustainability Tour

17th Annual
Bi**fuels**
Science and Sustainability Tour

SAVE THE DATE!
AUGUST 17 - 20, 2026



As the nation's leading producer of biofuels, Iowa is *the* place to gain a deeper understanding of how renewable fuels like ethanol and biodiesel are prepared to be a leader toward America's low-carbon future! Join experts for an educational, hands-on, and interactive look at the renewable fuels industry of today – and tomorrow! As the country grapples with big questions like how to combat climate change and ensure energy security, this tour will provide a better understanding of the challenges and exciting opportunities facing America's most dynamic energy sector.

**If you are unable to attend the tour, but someone else from your office might be interested, please send us the additional name(s).*

- Invited guests will include Congressional staff, White House staff & officials from EPA, USDA, Department of Energy, and key Iowa officials
- Planned tour locations include an ethanol plant, biodiesel plant, family farm, and many others

This is not an official invitation; Official invitations will be sent out in the coming months.

6b. 2026 Inaugural Biofuels Technical Tour

6c. State Trade Associations Meeting

6d. IRFA Member PACs

6e. Safety and Environmental Compliance Task Force

Announcement:

With the transition from Nathan Hohnstein to Iowa Corn Growers Association, Lisa Coffelt Marketing Director will be the new IRFA staff contact. She will be in contact with the Task Force to set a schedule for 2026.

7a. International Trade

From: U.S. Grains & BioProducts Council <grains@grains.org>
Sent: Monday, November 17, 2025 8:24 AM
To: U.S. Grains & BioProducts Council
Subject: Member Alert: Ethanol Wins in Southeast Asia



Developing Markets | Enabling Trade | Improving Lives

Dear valued member,

Multiple policy wins for U.S. ethanol have materialized in Southeast Asia over the past few weeks that we want to share with our members, underscoring the region's support for ethanol policy expansion and appetite for U.S. ethanol.

Viet Nam

The Viet Nam Ministry of Industry & Trade on 14 November 2025 published Circular 50/2025/TT-BCT, outlining a new roadmap for fuel ethanol utilization that will expand Viet Nam's ethanol utilization to the entire gasoline pool. The Circular instructs the following:

- Beginning 1 January 2026, Vietnamese fuel distributors are to begin transitioning RON95 gasoline to E10, with all RON95 gasoline being required to have 10 percent ethanol by 1 June 2026. RON95, which accounts for 80% of the country's gasoline consumption, currently contains 0 percent ethanol.
- Fuel distributors are permitted to continue selling E5 RON92, which accounts for 20% of the country's gasoline consumption, until 31 December 2030. Fuel distributors are permitted to migrate to E10 RON92 prior to this date on a discretionary basis but must transition RON92 to E10 by 1 January 2031.

The policy move is a significant win for the U.S. ethanol industry as the country's entire gasoline pool of 2.7 billion gallons per annum must now be blended with ethanol. With a GDP growth of 7 percent, Viet Nam is one of Southeast Asia's fastest growing economies and gasoline markets, with economic and income growth underpinned by foreign investment inflows and burgeoning export-oriented industries.

Under a business-as-usual scenario – i.e., current gasoline consumption dynamics hold – Viet Nam's total fuel ethanol demand will be 243 million gallons beginning June 2026. The total export market potential from June 2026 onwards will be approximately 160 million gallons, given Viet Nam's current ethanol nameplate production capacity of 84.5 million gallons. This represents a \$300 million export opportunity based on current U.S. ethanol export prices (FOB Gulf).

U.S. ethanol exports to Viet Nam currently face a 5 percent tariff, following multiple tariff reductions since 2017 when U.S. ethanol was tariffed 20 percent.

The new E10/E5 policy announcement follows multiple years of intense programming and advocacy by the U.S. Grains & BioProducts Council and the U.S. Department of Agriculture's Foreign Agricultural Service to both migrate Viet Nam's ethanol policy to the entire gasoline pool and reduce U.S. ethanol's tariff incidence.

Malaysia

The U.S. – Malaysia Reciprocal Trade Agreement, announced on 26 October 2025, includes the immediate removal of the import duty on U.S. denatured ethanol.

U.S. undenatured ethanol is also included in the trade agreement's tariff reduction schedule, though the tariff for undenatured ethanol will be incrementally reduced annually over a period of nine years until the tariff reaches 0 percent.

The move paves the way for fuel importers and blenders to import denatured ethanol for gasoline and SAF blending. Malaysia currently consumes 4.5 billion gallons of gasoline per year, making it the second largest gasoline market in Southeast Asia behind Indonesia. Malaysia is also a significant supplier of finished gasoline products to Southeast Asia, China and Australia.

The U.S. Grains & BioProducts Council and the U.S. Department of Agriculture's Foreign Agricultural Service are actively seeking clarification on whether U.S. denatured and undenatured ethanol will still be subject to Malaysia's Excise Tax (\$0.25 per litre + 15 percent) and Special Services Tax (10 percent).

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Sent: Thursday, September 4, 2025 3:16 PM
To: U.S. Grains & BioProducts Council
Subject: Member Alert: ICAO Revises CORSIA Carbon Intensity Values for U.S. Corn Ethanol-to-Jet



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The International Civil Aviation Organization (ICAO) has released its June 2025 update to the *CORSIA Default Life Cycle Emissions Values for CORSIA Eligible Fuels*, which reflects a more favorable baseline for U.S. corn ethanol-to-jet (ETJ). This revision carries important implications for the U.S. producer's role in global fuel markets, as it verifies U.S. corn ethanol as a CORSIA eligible fuel.

The new core LCA for standalone ethanol plants (not integrated with AtJ) is **54.1 gCO₂e/MJ**, and when paired with the updated ILUC value of **18.3 gCO₂e/MJ**, the total comes to **72.4 gCO₂e/MJ—about 81% of petroleum jet fuel**. This is a major improvement from the previous default of 91 gCO₂e/MJ.

For U.S. ethanol exports, the revision strengthens the value proposition in international markets where CORSIA compliance is becoming a central driver of fuel demand. It narrows the competitiveness gap between U.S. corn ethanol and Brazil's sugarcane pathway, which is particularly important as ICAO's update revised the carbon intensity of standalone sugarcane ethanol-to-jet upwards to **52.0 gCO₂e/MJ**. This change reinforces U.S. ethanol as a credible feedstock option in global SAF supply chains, especially in markets evaluating long-term offtake agreements.

Another important shift is CORSIA's recognition of Carbon Capture and Sequestration (CCS) as an approved decarbonization option. Any CCS reductions must be certified; values will depend on specific project performance. For perspective, applying a certified CCS reduction of **24-26 gCO₂e/MJ** would lower U.S. corn ethanol-to-jet to **48.4-46.4 gCO₂e/MJ —roughly 54-52% reduction in emissions of petroleum jet fuel**. This highlights the export relevance of investments U.S. plants are already investing in carbon management technologies and reinforces the potential for ethanol's role in international SAF markets.

The Council views these revisions as a positive development for U.S. ethanol's standing in global trade. Through lower default carbon values and maintaining CCS as an eligible credit, ICAO has strengthened U.S. ethanol's position in aviation decarbonization strategies. It reinforces the case for corn ethanol-to-jet as a smart bridge strategy: using sustainable, low-carbon ethanol today to help scale SAF, while 2G ethanol pathways continue developing toward commercial readiness.

The Council will continue to work with our members, international airlines, and policymakers to ensure U.S. ethanol's contribution to sustainable fuel markets is recognized and that U.S. exports remain a reliable and competitive option.

Monte Shaw

From: alertsadmin@opisnet.com
Sent: Tuesday, October 28, 2025 3:55 AM
To: Monte Shaw
Subject: BIOFUELS UPDATE: ***Indonesia Targets 10% Ethanol Blend Mandate in 2027

2025-10-28 04:54:38 EDT

***Indonesia Targets 10% Ethanol Blend Mandate in 2027

Indonesia plans to implement a 10% blend of ethanol or E10 in its gasoline pool by 2027, eventually increasing this to 20%, according to articles published by state-owned news agency Antara on Friday.

The switch to E10 has the dual benefits of reducing carbon emissions and lowering dependence on fuel imports. This is similar to how Indonesia's blending of 40% biodiesel in diesel, or B40, has reduced diesel imports and saved around \$40.71 billion in foreign exchange in the past five years, said Bahlil Lahadalia, energy and mineral resources minister.

To achieve the mandate, Indonesia intends to offer incentives, such as tax holidays, to attract investments in ethanol plants, which will likely use food crops, such as cassava, corn or sugarcane as feedstock.

Around 1.4 million kiloliters of ethanol will be needed annually to meet the E10 mandate, produced domestically instead of being imported, Lahadalia stated.

Also on Friday, Indonesia signed a memorandum of understanding with Brazil to collaborate and exchange information on biodiesel and ethanol blending.

Indonesia is the world's largest biodiesel blender with a present mandate of B40, while Brazil has the world's highest nationwide blend level of ethanol at E30.

The two countries will exchange expertise on implementing their biofuel mandates, Lahadalia added.

--Reporting by Kite Chong, kchong@opisnet.com; Editing by Mei-Hwen Wong, mwong@opisnet.com

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December 1, 2025

The Honorable Jamieson Greer
United States Trade Representative
600 17th Street, NW
Washington, D.C. 20508

Re: Docket Nos. USTR-2025-0007: Initiation of Section 301 Investigation: China's Implementation of Commitments under the Phase One Agreement; Notice of Hearing; and Request for Public Comment

Dear Ambassador Greer,

The Renewable Fuels Association (RFA) greatly appreciates the opportunity to submit comments in response to the U.S. Trade Representative's (USTR) Request for Comments on the Section 301 Investigation of China's Implementation of the Economic and Trade Agreement Between the Government of the United States of America and the Government of the People's Republic of China ("Phase One Agreement").

RFA is the leading trade association for America's ethanol industry. Our mission is to drive growth in American-made renewable fuels and bioproducts for a better future. Founded in 1981, RFA serves as the premier organization for industry leaders and supporters. With over 300 members, we work every day to help America become cleaner, safer, and more economically vibrant.

On behalf of RFA's membership, and the U.S. ethanol industry as a whole, we are extremely grateful to President Trump and his Administration for its steadfast commitment to fair and reciprocal trade with China. We applaud USTR for taking a closer look at China's failure to deliver on its Phase One commitments, which has resulted in a lost market opportunity for U.S. ethanol producers and farmers and caused significant financial losses. RFA provides the following comments in support of the instant Section 301 Investigation.

1. The United States is authorized to initiate an investigation under Section 301 of the Trade Act for China's failure to satisfy purchase commitments under the Phase One Agreement

Section 302(b) of the Trade Act of 1974, as amended (Trade Act), authorizes the Trade Representative to initiate an investigation to determine whether conduct is actionable under Section 301 of the Trade Act. Actionable conduct under Section 301(a) includes, inter alia, that the rights of the United States under any trade agreement are being denied or that an act, policy, or practice of a foreign country violates, or is inconsistent with, the provisions of, or otherwise denies benefits to the United States under, any trade agreement.

On December 13, 2019, following months of negotiations, the United States and China reached the historic and enforceable Phase One Agreement. Under the Phase One Agreement, China agreed to make structural changes to correct distortive acts, policies, and practices in the areas of intellectual property, technology transfer, agriculture, and financial services, and included certain issues covered in the Section 301 investigation of China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation. Given the persistent and large bilateral U.S. trade deficit with China, the Phase One Agreement also committed China to make substantial additional purchases of U.S. goods and services.

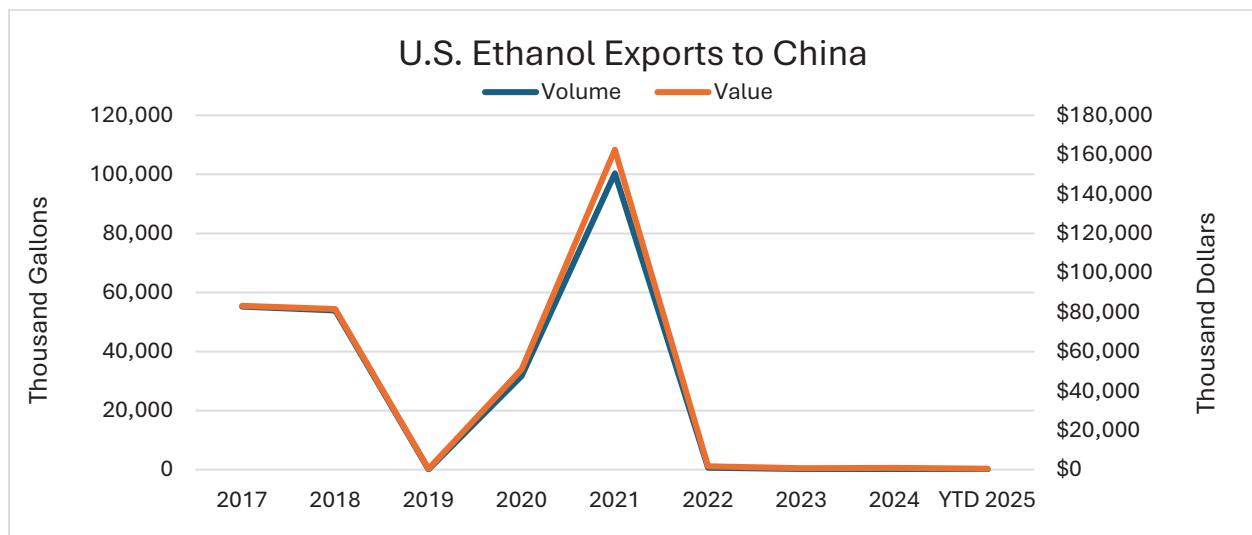
2. China failed to implement its express agricultural product commitments under the Phase One Agreement by failing to make promised and sustained purchases of ethanol and distillers grains

With respect to the purchase commitment of U.S. goods and services under the Phase One Agreement, China agreed to purchase at least \$200 billion more of such goods and services during 2020 and 2021, than was purchased during the 2017 baseline year. Of these U.S. goods and services, the commitment specifically included the purchase of at least \$32 billion more in agricultural goods in 2020 and 2021 than was purchased in 2017. While there are many goods that make up the agricultural products intended for purchase by China, the Phase One agreement specifically referenced ethanol and distillers grains as potential targets for increased agricultural imports. Finally, the agricultural purchase

commitments under the Phase One Agreement further committed China to work to increase its purchase commitment of agricultural goods by an additional \$5 billion annually.

In the end, China purchased only 58 percent of the total U.S. goods and services exports in 2020 and 2021 that it had committed to buy under the Phase One Agreement. In fact, China ultimately failed to buy any of the additional \$200 billion in goods in 2020-21, instead falling \$11.6 billion short of even reaching the baseline level of purchases. Specifically, with respect to ethanol, after the signing of the Phase One Agreement, in 2020, China purchased just 31.7 million gallons of ethanol from the U.S. valued at just under \$51 million. Thereafter, in 2021, China purchased just over 100 million gallons of ethanol from the U.S. valued at \$162 million.

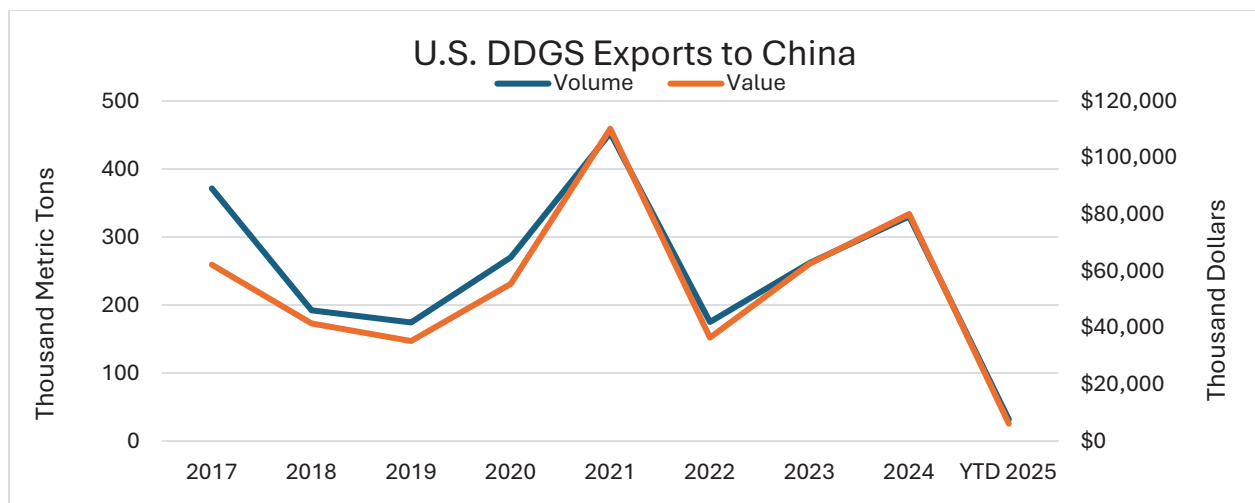
Given a 2017 baseline value for ethanol imports estimated at \$83.5 million under the Phase One Agreement, China's ethanol purchases for 2020 were well below the baseline level, while total 2020-21 purchases were roughly 30 percent above the baseline; however, total purchases of U.S. ethanol in 2020-21 were far short of the stated intention of the Phase One Agreement and were not reflective of China's commitment to procure an additional \$32 billion in agricultural products. While 2020-21 ethanol purchases were generally in line with 2017 baseline levels, there were no meaningful increases over the long term, as promised under the Phase One Agreement. Since 2021, U.S. ethanol imports by China have essentially fallen to near zero and flatlined.



As confirmed by the above trade data for 2020 and 2021 (and subsequent years), China has failed to provide U.S. ethanol producers the sustained market access that was initially promised under the Phase One Agreement. While China briefly resumed imports of U.S. ethanol immediately following the agreement, those purchases represented near-baseline trade levels rather than meaningful increases and have since dissipated.

With respect to distillers grains imports, a similar trade pattern occurred following the enactment of the Phase One Agreement. Despite promises of increased purchases of agricultural products, China's imports of dried distillers grains with solubles (DDGS) in 2020-21 stayed near the 2017 baseline level and did not experience any meaningful increase. In 2020, China imported 270,000 metric tons of DDGS at a value of just over \$55 million; significantly less than the 2017 baseline of \$62 million. And, while the value of China's DDGS imports increased in 2021 to \$101 million, since then the volumes have remained volatile, falling precipitously in 2022, rising in 2024 and collapsing again in year-to-date 2025.

Once again, as in the case with U.S. ethanol, China's imports of U.S. distillers grains following the enactment of the Phase One Agreement did not result in the sustained market access that American producers were promised.



3. China's failure to satisfy purchase commitments under the Phase One Agreement requires reciprocal duties on Chinese agriculture imports

China must be held to account for its failure and refusal to meet the terms of the Phase One Agreement, specifically its express commitments to purchase \$32 billion in

additional agricultural imports, above and beyond the baseline level reflected in 2017. To account for the failed purchases, it is only appropriate that reciprocal duties in the aggregate amount of \$32 billion on any and all Chinese agriculture and agriculture-related exports to the United States.

4. Conclusion

Today, as our nation's farmers and rural communities face serious economic challenges, it is critical that our trading partners live up to their commitments and be held accountable for failing to comply with key terms and provisions negotiated in the process. Moreover, trading partners must act in good faith as we work to negotiate longer-lasting, more resilient trade agreements. It is critical that China work to restore its commitment to agriculture purchases under the Phase One Agreement or otherwise face reciprocal action for its failure and/or refusal to do so.

Once again, we greatly appreciate the opportunity to provide comments on USTR's Section 301 Investigation against China. Please know that we stand in support of President Trump in this effort to hold China accountable for its commitments under the Phase One Agreement. Moreover, we look forward to continuing to work with USTR and the Administration to restore full and fair access for U.S. ethanol and its co-products in international markets, including China and beyond.

Respectfully submitted,



Geoff Cooper
President and CEO

FEEDBACK ON THE REVIEW OF THE CO₂ STANDARDS FOR CARS AND VANS REGULATION

The U.S. Grains & BioProducts Council (USGBC) thanks the European Commission for the opportunity to provide feedback on the important topic of the review of the Regulation setting CO₂ emission standards for new cars and vans.

The USGBC is an organization with specialization in markets for barley, corn, sorghum, and related products – particularly bioethanol. In addition, our knowledge extends into clean fuels policy and its relation to environmental sustainability. The Council's work worldwide is supported by U.S. farmers and agribusiness organizations that recognize how fundamental trade is to their future profitability, stability and peace. The Council is supportive of developing innovative ways to advance clean fuels policy to support clean fuels production and transportation.

THE ROUTE TO LONG-TERM ROAD TRANSPORT DECARBONIZATION MUST BE FEASIBLE, COST-EFFECTIVE, AND SOCIALLY FAIR

The USGBC fully supports the EU's ambitious climate goals, both in the near term for 2030 and in the longer run for 2040 and 2050. USGBC member companies have a long track record of substantial contributions to European climate action through sourcing of sustainable bioethanol for transport sector decarbonization. The pursuit of deep decarbonization on ambitious timelines will ensure the importance of these contributions will grow, as failure to fully leverage all immediately available decarbonization options would contribute to a growing decarbonization deficit that would be almost impossible to make up for in the 2040's and 2050's. This theme of interdependence of climate targets, their timelines, and the means to reach them is relevant not only for the EU's climate policy as a whole but also in the specific case of the CO₂ Standards for Cars and Vans Regulation review, as explored in more detail below.

The USGBC notes that the Regulation has traditionally been an important driver of CO₂ emission reductions in the European road transport sector. At the same time, the USGBC understands and sympathizes with the concerns expressed by many stakeholders in the European automotive sector, as expressed through the Strategic Dialogue on the future of the European automotive industry. While ambitious targets are vital, the measures to achieve them must also be feasible, cost-effective, and socially fair. This is something that can be checked and reaffirmed through the review of the CO₂ Standards for Cars and Vans Regulation review, a process wisely fast-tracked by the Commission.

When the Regulation is reviewed and possibly revised, particular attention should be placed on the concept of technology neutrality, which has traditionally been the watchword of the European Commission in crafting regulation. As such, the USGBC was pleased by the remarks of the Commission President Ursula von der Leyn in her State of the European Union speech highlighting technology neutrality in context of the review of the Regulation's 2035 targets. All solutions that can be proven to enable sustainable mobility should be allowed to contribute to the future of the European road transport system, from electric vehicles to internal combustion engine vehicles running on carbon-neutral fuels, including sustainable ethanol-based solutions. Lastly, if despite the right goals, the chosen pathways do not deliver the expected results in practice, policymakers should retain the flexibility to revisit the Regulation's implementation timelines.

The USGBC stands ready to work with the European policymakers to deliver a transition to decarbonized road transport that is both ambitious and inclusive. Please do not hesitate to contact us if you have any

questions regarding the feedback. The USGBC is committed to long-term productive dialogue and is available to answer any further questions the Commission may have.

Contact

Ryan LeGrand

President and CEO

U.S. Grains & BioProducts Council

Washington, D.C.

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ABOUT THE U.S. GRAINS & BIOPRODUCTS COUNCIL

The U.S. Grains & BioProducts Council (USGBC) develops export markets for U.S. barley, corn, sorghum and related products including distiller's dried grains with solubles (DDGS) and ethanol. With full-time presence in 28 locations, the Council operates programs in more than 50 countries and the European Union. The Council believes exports are vital to global economic development and to U.S. agriculture's profitability.

Over the last two decades, U.S. corn yields have increased by over 40%, while overall cropland has remained largely stable. Advances in precision agriculture, conservation tillage, and co-product utilization (e.g., DDGS for livestock feed) have enabled U.S. farmers to meet growing biofuel demand without significant land expansion. Indeed, updated GREET 45Z lifecycle analysis from the U.S. Department of Energy places Indirect Land Use Change (ILUC) emissions for U.S. corn ethanol at a mere ~4.6 gCO₂e/MJ, which is significantly lower than several previous assumptions.

The USGBC believes biofuels such as bioethanol are vital to international transportation decarbonization efforts and country-specific climate commitments. U.S. bioethanol provides an immediate solution to decarbonize road transportation with long-term potential to decarbonize long-haul trucking, aviation, and maritime transport. In the last marketing year (2023/2024), 533 million liters of U.S. bioethanol were exported to the EU for blending with gasoline, representing a major source of road transport decarbonization.



U.S. GRAINS & BIOPRODUCTS COUNCIL

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2026 MEMBERSHIP DIRECTORY



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Information in this directory was deemed accurate as of October 2025.

23rd International Marketing Conference & 66th Annual Membership Meeting

Feb. 11-13, 2026
Panama City, Panama

66th Annual Board of Delegates Meeting

July 29-31, 2026
Milwaukee, WI



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Verity Ulibarri	2025	Don Jacoby	2003	E. Thurman Gaskill	1981
Brent Boydston	2024	Dale Spurgin	2002	William Kerkvliet	1980
Josh Miller	2023	Lisle Cook	2001	Owen J. Newlin	1979
Chad Willis	2022	Doug Robinson	2000	Lyle P. Campbell	1978
Jim Raben	2021	Michael Seeger	1999	Alan J. Noble	1977
Darren Armstrong	2020	Robert Dickey	1998	Harold E. Noren	1976
Jim Stitzlein	2019	Glen Buckley	1997	Elbert E. Harp	1975
Deb Keller	2018	Ron Saylor	1996	Fred J. Ludwig	1974
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Alan Tiemann	2016	Larry L. Groce	1994	A. Henry Becker	1972
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Jim Broten	2009	William V. Griffin	1987	William R. Pearce	1965
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Terry Wolf	2004	Robert M. Book	1982		

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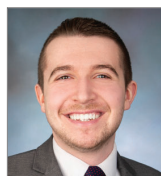


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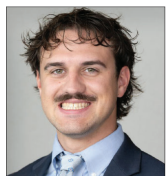
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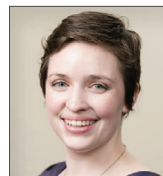
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The U.S. Grains & BioProducts Council has a full time presence in 30 countries and programs in more than 70 countries to develop new markets for U.S. corn, sorghum, barley, distiller's dried grains with solubles (DDGS) and ethanol.

WORLDWIDE

PEOPLE'S REPUBLIC OF CHINA

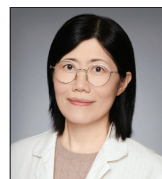
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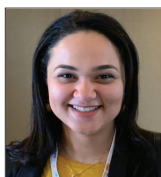
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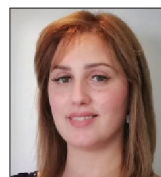
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June 2025 Monthly Management Report

Middle East, Africa & Europe Regional Update

PROGRAM REPORTS

Dropet ethanol conference in Marbella, Spain, June 2-6, 2025

The Council's ethanol consultant for Europe, Alberto Carmona, attended the European ethanol conference in Marbella organized by Dropet with presence of most European players-producers, traders and obligated parties- as well as US players, Brazilian players and Central American ones.

MARKET INFORMATION

Ethanol Exports:

The U.S. exported 184.67 million gallons of ethanol in May, according to data released by the USDA Foreign Agricultural Service on July 3, 2025. Exports were up when compared to the previous month.

The 184.67 million gallons of ethanol exported in May were up when compared to both the 172.23 million gallons exported the previous month and the 167.69 million gallons exported in May of last year. Canada was the top destination for U.S. ethanol exports at 61.34 million gallons, followed by the Netherlands at 31.9 million gallons and the U.K. at 30.91 million gallons.

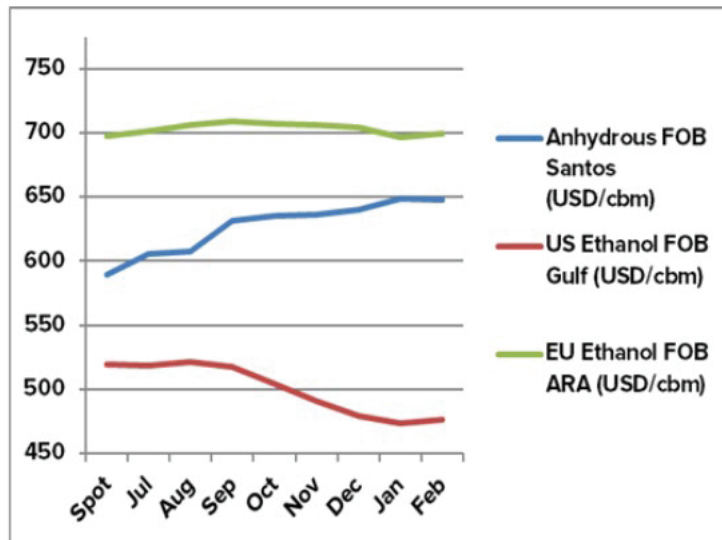
For the first time, Europe (EU+UK) surpassed Canada as number one destination of US exports. December 2024 was the previous record with 62.6 mill gal exported. It's worth noting that the cumulative exports to Europe in 2025 were 210.1 mill gal versus 147.8 mill gal exported during the same period last year (+142%).

Competitor Brazil exported and immaterial 918k gal to Europe during May 2025 which must be advanced material (bagasse-based ethanol) once Fob Santos values continue to trade at a 0.30 – 0.38\$/gal premium versus Fob Gulf values, making import economics into Europe only viable from the U.S.

US exports to Africa were 5.7 mill gal during May, up from zero in April 2025. The main destination of this flow continues to be Nigeria and then Ghana with the May volume only going to Nigeria for industrial use. Brazil exported zero volume of fuel grades to Africa during May, just like during April. However, they did export larger volumes of industrial grades (hydrous grade) to Nigeria (6 mill gal), Ghana (1.6 mill gal) and Cameroon (1,2 mill gal).

The Middle East didn't take any volume during May and for a seventh month in a row, but although not during May, other nearby blending hubs like Cyprus have been taking some volumes with final destination most likely being the Middle East as finished gasoline. Brazil also exported zero volume of any grade to Middle East destinations.

During April the discount of Fob Gulf prices vs. Fob Brasil remained to 0.38\$/gal in the front of the curve while it is even higher close to 0.76\$/gal in the back of the futures curve. See graph below with a comparison of FOB prices:



Europe:

EU

EU renewable ethanol reduced GHG emissions by 79% compared to fossil fuel in 2024, according to the latest certified data; EU ethanol biorefineries produced more food and feed than fuel.

Ukraine

The EU has proposed a 25% increase in the duty-free quota for imports of Ukrainian ethanol, which could add further pressure to an EU market already struggling with weak prices due to high import levels. Details of a revision of the EU-Ukraine Deep and Comprehensive Free Trade Area, initially agreed in late June, were released to industry showing a rise in the quota to 125,000 MT, up from the annualized 100,000 MT per year quota for 2025 announced last month.

New EU-Ukraine Trade Deal

On June 30, the European Commission announced that it had concluded negotiations with Ukraine on the review of the EU-Ukraine Deep and Comprehensive Free Trade Area (DCFTA). The full details still need to be finalized, but it is understood that there are tariff-free quotas for many Ukrainian agri-food exports, while some 'sensitive' goods, including corn, remain capped. The exact amounts are not yet known, but it was noted that the changes will allow Ukraine to maintain the level of exports of recent years for many products.

Why is it important: Ukraine plays a crucial role in supplying the EU with many agricultural products, including corn. The definition of the quota per se is not expected to affect their exports of corn unless an over-quota tariff is established for corn, as wheat and barley do. Permanent monitoring on how things continue to evolve is relevant.

UK

The UK has introduced an annual duty-free quota for 370 mil gals of US ethanol, following a trade agreement first announced earlier this year. The quota was set at 242 million gal between 30 June and 31 December 2025, with the subsequent quota set at 92 million gal every quarter.

U.S.- EU Trade Measures and Negotiations

Negotiations between the EU and the U.S. intensified in June ahead of the previously agreed ‘pause’ until July 9 for the U.S. reciprocal tariffs and possible EU countermeasures. The EU paused countermeasures (including 25 % on corn) against the U.S. steel tariffs until July 14 before the new August 1st deadline was announced. Uncertainty continues to be the rule, with industry players concerned about future imports from the U.S.

Why is it important: Even with the second half of the year traditionally being the period when the Brazilian-corn is more competitive than the U.S. and therefore, a decrease would normally be expected, U.S. sorghum exports that had resumed recently (especially to Spain) may not be able to continue reaching this market, as well as corn co-products. All eyes are on the new deadline and especially on how the negotiations between the U.S. and the EU go.

Ireland

On June 25, 2025, the Department of Transport of the Republic of Ireland published the Renewable Fuels for Transport Policy Statement 2025 – 2027. The ministry developed this policy review through stakeholder consultation and expert analysis in cooperation with the Sustainable Energy Authority of Ireland (SEAI) and the National Oil Reserves Agency (NORA). The policy builds on the renewable transport fuel obligation (RTFO) and sets ambitious goals for renewable energy integration, sustainability and emissions reduction. Following the Irish Climate Action Plan (CAP) and the EU Renewable.

Ukraine

The EU has proposed a 25% increase in the duty-free quota for imports of Ukrainian ethanol, which could add further pressure to an EU market already struggling with weak prices due to high import levels. Details of a revision of the EU-Ukraine Deep and Comprehensive Free Trade Area, initially agreed in late June, were released to industry showing a rise in the quota to 125,000 MT, up from the annualized 100,000 MT per year quota for 2025 announced last month.

IATA

The International Air Transport Association (IATA) expects sustainable aviation fuel (SAF) production to reach 2 million tons (Mt) (2.5 billion liters) or 0.7% of airlines’ total fuel consumption in 2025.

Middle East:

Turkey

Turkey is introducing legislation mandating the use of sustainable aviation fuel (SAF) in international flights with the objective of achieving a 5% reduction in emissions by 2030, according to the country's aviation authority.

Saudi Arabia

Saudi Arabia's General Authority of Civil Aviation has signed a Memorandum of Understanding with Airbus aimed at boosting the uptake of sustainable aviation fuel in the Middle East. The MoU, signed at the 2025 Paris Air Show, focused on supporting the use of low-carbon fuels and SAF.

Africa:

Ghana

Ghana became the first African country to officially trade carbon credits under Article 6.2 of the Paris Agreement, after transferring 11,733 tons of verified emission reductions to Switzerland. The reductions were generated through the Transformative Cookstove Activity in Rural Ghana project, which has provided over 180,000 households with improved cookstoves that reduce indoor air pollution and cut fuel costs by over 50%. The project is one of two bilateral mitigation activities approved under the 2020 Ghana-Switzerland cooperation agreement. It was implemented by Envirofit, the ACT Group, and funded by the Klik Foundation. Ghana is only the second country in the world to utilize Article 6.2 to transfer credits. While several other African nations – including Senegal, Malawi and Kenya – have signed bilateral carbon trading agreements, none have yet reached the stage of transferring credits. The news bodes well for the development of Ghana's carbon market, which is projected to attract USD 1.1 billion in investment by 2030.

Nigeria

Nigeria is set to develop a green methanol industrial complex and is seeking a partnership with Brazil to produce the biofuel, according to a government release.

Dangote Petroleum Refinery is poised to commence nationwide distribution of petrol and diesel by August 15, 2025, offering complimentary logistics to various consumers including marketers, manufacturers, and large-scale industries. This ambitious initiative involves deploying 4,000 new CNG-powered tankers and establishing distribution hubs to ensure efficient delivery.

Furthermore, the refinery will provide a credit facility for bulk purchasers. This move is anticipated to significantly reduce fuel distribution costs, stabilize retail prices for petrol and diesel across Nigeria, stimulate economic growth, and mitigate inflationary pressures by bringing down production costs for industries.

Uganda

On July 1, 2025, the Minister for Energy and Mineral Development of Uganda announced, during a media briefing, that the national biofuels blending program will begin from January 2026. As part of the program, a biofuel E5 mandate of ethanol must be blended into gasoline starting from January 2026, increasing to E20 in line with the targets set in the Biofuels Act. The launch, as announced by the Minister, includes a six-month incubation period from July 1, 2025, to December 31, 2025, during which key stakeholders, mainly oil marketing companies, will adapt to blending standards and operational requirements.

Mexico Regional Update

MARKET INFORMATION

Yucatán Advances Sustainable Aviation Fuel (SAF) Production from Organic Waste

The state of Yucatán has made progress in developing Sustainable Aviation Fuel (SAF) using organic waste such as nejayote, a byproduct of corn nixtamalization, and henequen pineapple residues. This project, led by Dr. Juan Carlos Chavarría from the Yucatán Scientific Research Center (CICY), was awarded first place in the Airbus SAF 2025 Award. The research involved producing SAF through the Alcohol-to-Jet (ATJ) process, including technical and economic simulations carried out in collaboration with the Autonomous University of Yucatán (UADY) and the Private University of the Peninsula. The project has attracted interest from local companies and is part of the national efforts driven by Plan México to promote SAF production in the country.

Promoting the use of biofuel in Querétaro

The Querétaro Energy Cluster and the Biomovilidad association signed an agreement to promote the use of biofuels in the state. The agreement will allow access to scientific information and analyze their viability as a technological alternative in the energy mix. Alma Domínguez, director of the cluster, highlighted the strengthening of energy research, while Galo Galeana, director of Biomovilidad and USGC Ethanol consultant, emphasized the environmental and health benefits of using bioethanol in transportation.

Mining companies reduce diesel use

In Mexico, the adoption of renewable energy by mining companies has already led to a 40% reduction in diesel use in some operations, especially in remote areas where energy supply stability is important, according to an analysis report by Aggreko, an energy solutions company.

Southeast Asia & Oceania Regional Update

RAPP UPDATE

- Southeast Asia Commercial & Technical Trade Team Engagements – ongoing
- Widening Stakeholder Engagement & Global Event Influence – ongoing
- Indonesia E7 Promotion, Implementation, & Nationwide Development – ongoing
- Viet Nam Nationwide Scaling to E10 Adoption – ongoing
- Philippines E20 Commercial Implementation & Mandate Creation – ongoing
- SE Asia Emerging & Frontier Market Development & Engagement – ongoing

PROGRAM REPORTS

Indonesia:

Ethanol Roadmap

A revised ethanol roadmap is in the final stages of implementation.

MARKET INFORMATION

Oil Market Update

In June 2025, the average price of Brent crude oil rose to USD 71.46 per barrel, up from USD 64.22 in May. Early in the month, global crude markets remained broadly stable as OPEC+ proceeded with its gradual unwinding of previous production cuts to rebalance supply following extended periods of price strength. Meanwhile, U.S. crude production reached a record high of approximately 13.5 million barrels per day, reinforcing expectations of robust global supply. Although demand growth remained positive, it was moderate, with rising electric vehicle adoption in China and Europe continuing to temper forecasts for incremental oil demand. These factors collectively contributed to mild downward pressure on prices, with Brent crude trading predominantly in the low-to-mid USD 70s per barrel range as markets anticipated a supply surplus in the second half of the year.

On June 13, geopolitical tensions escalated sharply following Israeli airstrikes on Iranian nuclear facilities, significantly raising the risk of broader regional conflict. This development heightened immediate concerns over the security of the Strait of Hormuz, a key transit route for approximately 20% of the world's daily oil supply. In response, Brent crude prices surged by over 7% in a single day, surpassing USD 80 per barrel as markets priced in the geopolitical risk premium. This spike also drove increased trading volumes and hedging activity as market participants sought to manage heightened near-term uncertainty.

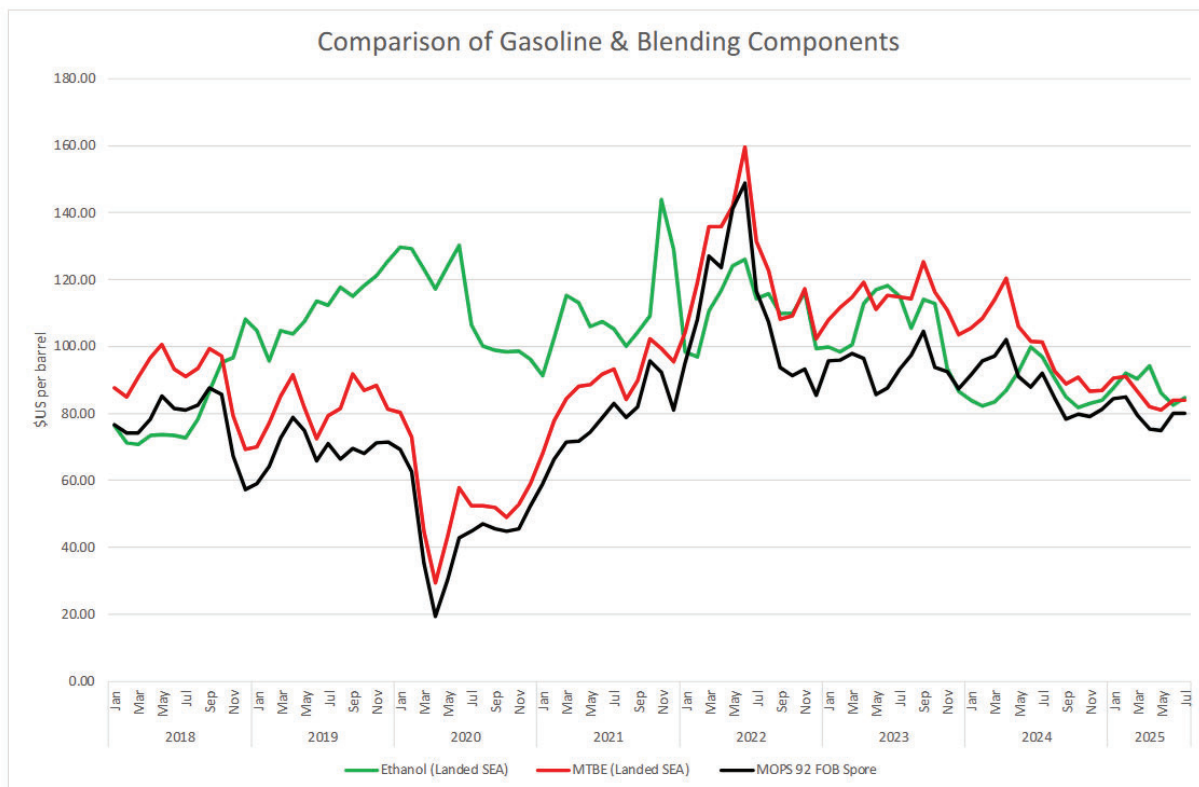
Regional shipping markets experienced acute stress amid these developments. On June 17, Asian tanker freight rates reached year-to-date highs as owners secured substantial war risk premiums due to concerns over commercial shipping becoming entangled in the Israel-Iran conflict. Shipowners actively sought and obtained additional premiums for voyages into what was increasingly viewed as a de facto war zone, according to market sources.

By late June, with no further escalation in hostilities, immediate geopolitical fears began to subside. The Strait of Hormuz remained operational, and there were no direct attacks on oil tankers, allowing crude oil prices to retrace toward levels observed earlier in the month. However, the market remained anchored by projections of a supply surplus of around 1.2 million barrels per day in the second half of 2025, with analysts forecasting that WTI could trend into the upper USD 40s and Brent into the USD 50–60 range later in the year. Despite this easing in oil prices, shipping and insurance costs remained significantly elevated, reflecting a newly embedded structural risk premium in global logistics for Middle Eastern routes.

Period	1-30 June 2025		
	Ethanol (Landed Singapore)	MTBE (Landed Merak)	MOPS 92
Monthly Average, \$/bbl	82.40	84.06	80.10
Current vs Previous Month, %	-4.4%	+3.6%	+6.8%

*Ethanol FOB Houston plus MR freight (assume no premium & import tariff not included)

* MTBE FOB Singapore plus 5kt basis freight (assume no premium & import tariff not included)



Indonesia:

E5 Rollout and Future Developments

The uptake of an E5 gasoline blend in a city in Central Java has topped 76,000 liters since its early June launch, surpassing initial expectations, according to a local media report citing Indonesia's state-owned refiner.

Among the three Pertamina fuel retail stations offering Pertamax Green 95, a mix of Pertamax and 5% bioethanol, in Semarang, including Akpol, CitraGrand, and Silayur, the Akpol station recorded the highest sales, Jateng Today reported.

"The average daily consumption reaches around 4,000 liters. This is a very large number for the Central Java region," said Taufiq Kurniawan, Area Manager for Communication, Relations & CSR at Pertamina Patra Niaga Central Java.

The country's Ministry of Energy and Mineral Resources announced plans to mandate the use of a 5% fuel ethanol blend by 2026, which is expected to be formalized through a ministerial decree. The E5 rollout will focus initially on Java due to current supply constraints, and based upon the latest proposed bioethanol phase-out roadmap, E5 implementation will span from 2024 to 2028, followed by a transition to E10 from 2029 to 2035. Pertamina plans to expand distribution of Pertamax Green 95 to other areas in Central Java, including Yogyakarta, Tegal, and Solo.

In other news, two large-scale bioethanol plants are set to be developed in East Java, Indonesia, in separate projects led by local and Japanese firms, according to a local media report. The projects in Bojonegoro Regency will be led by PT Butonas Petrochemical Indonesia and Japan International Cooperation Agency (JICA), with a combined investment expected to exceed IDR 22.8 trillion (\$1.47 billion), reported local news portal SuaraBanyuurip.

PT Butonas will build an ethanol and methanol plant in the forest area of RPH Sawitrejo, Bandungrejo Village, Ngasem District, which will use sorghum as key feedstock and will have a 5,000-hectare area allocated for sorghum cultivation. The site is located near the Jambaran-Tiung Biru gas processing facility. The company is currently awaiting a forest area release permit from Indonesia's Ministry of Forestry. Meanwhile, JICA is preparing to build a corn-based bioethanol plant in Katur Village, Gayam District, which will require 1,400 hectares of land.

Indonesia's Ministry of Energy and Mineral Resources recently announced that the nationwide rollout of the E5 ethanol fuel blend will now be mandated by 2026, to be formalized through an upcoming ministerial decree. This marks a delay from the government's earlier plan to implement E5 across Java Island in 2024, with a broader E10 target set for 2029. Currently, there are 13 bioethanol producers spread across 11 regions in Indonesia, which is still far short of the requirements for the planned fuel blending increase.

Stakeholder Widening – Engagement with Indonesian Chamber of Commerce & Industry (KADIN)

On 17th June, USGC conducted a follow-up meeting with the Indonesian Chamber of Commerce & Industry (KADIN) to discuss fuel ethanol trading opportunities for Indonesia. USGC provided KADIN a presentation package on the opportunities for fuel ethanol in Indonesia and related

policy changes that are required. USGC plans to meet with KADIN in-person during our next Jakarta visit to discuss feedback from their subsequent internal / industry meetings and plan next steps.

Thailand:

SAF Engagement: ASAFA IPS Bangkok

The ASAFA Innovation & Policy Summit in Bangkok underscored both the opportunities and persistent hurdles for SAF development in Southeast Asia, with a particular focus on Thailand. While the region benefits from abundant agricultural resources and underutilized ethanol production capacity, SAF adoption remains constrained by weak domestic demand signals, regulatory gaps, and limited policy incentives to bridge the significant cost gap with conventional jet fuel. Thai ethanol producers are operating at roughly 50% capacity, largely due to shrinking fuel ethanol demand, as the rise of electric vehicles (EVs) has further eroded market potential for traditional liquid fuels. Some producers have pivoted toward exploring higher-value applications such as bioplastics and green chemicals, though a clear path forward for ethanol-to-SAF development will require robust government backing.

Conference discussions highlighted growing recognition of Alcohol-to-Jet (ATJ) as a viable future pathway for SAF in Thailand, especially given the country's strong ethanol infrastructure and available feedstocks like cassava and sugarcane. However, producers stressed that without clear policy frameworks or incentives, investments in ATJ and other SAF technologies are unlikely to move forward. Additionally, certification hurdles—such as CORSIA's exclusion of molasses-to-ethanol for SAF—remain a barrier for Thailand's current production profile. Beyond ethanol, Thailand is also exploring diverse feedstocks such as camelina to further diversify SAF pathways.

The summit emphasized the importance of cross-sector collaboration between oil refineries, ethanol producers, feedstock suppliers, and aviation stakeholders. The broader region continues to lag behind Europe in demand, but Thailand's existing infrastructure offers potential for leadership if policy, investment, and certification align. Financing discussions highlighted successful models where public-private partnerships and strategic corporate investment can de-risk early projects through guaranteed offtake and feedstock security. However, SAF pricing structures—still tied to premiums over Jet A1 rather than production costs—continue to inhibit liquidity and wider market adoption.

USGC's engagement at the summit centered on promoting the ATJ pathway and raising awareness of ethanol's potential as a viable SAF feedstock for the region, particularly as waste oils like UCO face growing limitations. Relationship-building with ethanol industry leaders and government stakeholders remains a critical next step to position U.S. ethanol within Southeast Asia's evolving SAF landscape.

Vietnam:

E10 Retail Workshop in Ho Chi Minh City, Vietnam

The USGC SEA Ethanol team, along with representatives from Growth Energy and the Renewable Fuels Association, traveled to Ho Chi Minh City to lead a technical workshop focused on building commercial and technical capacity for E10 ethanol-blended gasoline. The program, hosted in partnership with the Vietnam Petroleum Association (VINPA), attracted over 120 participants, including key government ministries (MOIT, Ministry of Finance, Ministry of Construction), state-owned fuel companies, private sector fuel retailers, and industry stakeholders.

The workshop addressed best practices for retail infrastructure, fuel dispensing technology, supply chain integrity, and consumer communications, highlighting evidence that higher blends such as E10 are fully compatible with Vietnam's existing infrastructure and vehicle fleet, especially motorcycles. VINPA has formally recommended raising the ethanol blend from E5 to E10 by October 1, 2025. Amendments to Decrees 49 and 53, along with stakeholder support from major oil companies like Petrolimex and PV Oil, suggest that Vietnam has both the infrastructure and political alignment to achieve this transition.

In parallel, USGC conducted side engagements with MOIT and Petrolimex to further discussions on future MOUs and support ethanol's role in Vietnam's energy diversification. The Vietnamese ethanol market stands at a critical juncture, with regulatory updates, infrastructure readiness, and market alignment converging to make nationwide E10 adoption a credible near-term prospect.

Philippines:

E20 Retail Workshop in Manila, Philippines

The delegation then traveled to Manila to conduct an E20 Retail Fuel Workshop in partnership with the Philippines Department of Energy (DOE). The workshop convened nearly 100 stakeholders from fuel retail, ethanol production, policy, and the downstream fuel industry. DOE Undersecretary Alessandro O. Sales and U.S. Agricultural Attaché Herpin Rochet Jateng opened the session, reflecting strong government support for higher ethanol blends.

With the Philippines officially crossing the regulatory threshold for E20 adoption in 2024, this workshop provided technical insights to support the discretionary sale of E20 alongside the existing E10 mandate. Presentations by Growth Energy, RFA, SGS INSPIRE, and Southwest Research Institute addressed infrastructure readiness, vehicle compatibility, safety, and the broader benefits of E20 adoption.

While E20 adoption remains voluntary and modest, momentum is building due to cost savings, import substitution goals, and emissions-reduction targets. The Philippines' pathway toward broader E20 adoption reflects a confluence of regulatory readiness, private sector initiative, and favorable economics, with stakeholders optimistic about future mandate expansion.

Taiwan Regional Update

PROGRAM REPORTS

Meeting with Legislator Chiu Chih-Wei to Discuss Policy Support for Low-Carbon Ethanol-Blended Gasoline in Taiwan

On June 6, 2025, USGC met with Legislator Chiu Chih-Wei to engage in policy dialogue on the expansion of ethanol-blended low-carbon gasoline in Taiwan. USGC Taiwan Director Michael Lu and the Council's ethanol consulting team discussed three key policy proposals aimed at promoting ethanol fuel as part of Taiwan's broader carbon reduction strategy.

1. Support for the Continuation of the E3 Ethanol Gasoline Pilot Program - The USGC called on Legislator Chiu to support the continued implementation of the "E3 Pilot Program" and to encourage the Ministry of Economic Affairs to adopt a more proactive and diversified approach to carbon reduction through alternative fuels.
2. Expansion of Pilot Fueling Sites in Kaohsiung - Recognizing Kaohsiung's commitment to green development, the USGC and Legislator Chiu discussed the potential for expanding ethanol fuel pilot stations across the city. The goal is to promote cleaner transportation, reduce urban carbon emissions, and help alleviate air pollution.
3. Co-hosting a Policy Forum on Multi-Fuel Strategies and Industrial Transition - USGC expressed interest in partnering with Legislator Chiu's office to organize a roundtable in the second half of 2025. The forum would bring together experts from government, industry, and academia to explore how diversified fuel strategies—such as bioethanol—could support Taiwan's automotive and motorcycle sectors in transitioning toward a more sustainable and low-carbon future.

Following the meeting, USGC provided Legislator Chiu and his team with detailed information on global ethanol fuel development and related policy frameworks. Legislator Chiu affirmed his support for advancing ethanol fuel use in Taiwan and pledged to make related inquiries with the Ministry of Transportation and Communications, the Energy Administration, and CPC Corporation, Taiwan, to help move the conversation forward.

Meeting with Minister Kuo Jyh-Huei to Discuss Bioethanol's Role in Taiwan's Low-Carbon Future

Sincerely appreciated Minister Kuo Jyh-Huei of the Ministry of Economic Affairs (MOEA) for graciously taking the time to meet with USGC Taiwan Director Michael Lu and the Council's ethanol consulting team. The high-level meeting also included participation from Vice Minister Lai Chien-Hsin, Administrator Lee Chun-Li of the Energy Administration, and Mr. Lo Po-Tung, Vice President of CPC Corporation, Taiwan.

This rare and valuable opportunity to engage directly with Minister Kuo enabled the USGC team to present the strategic advantages of U.S. bioethanol—its cost-effectiveness, strong carbon reduction performance, and its potential to reduce Taiwan's reliance on fossil fuels, thereby enhancing the nation's energy resilience. The team also emphasized how U.S. ethanol can serve as a reliable and sustainable feedstock for Taiwan's emerging production of Sustainable Aviation

Fuel (SAF). Minister Kuo demonstrated exceptional openness and provided several concrete suggestions for how public-private collaboration could be advanced.

The USGC looks forward to continued and closer collaboration with MOEA and other key government agencies to support Taiwan's efforts in expanding its use of low-carbon ethanol gasoline blends and scaling up SAF development. Together, we hope to contribute meaningfully to Taiwan's energy transition and climate goals.

USGC Taiwan Facilitated Strategic Dialogues Between CPC Taiwan and Leading U.S. SAF Companies Gevo and LanzaJet

USGC successfully facilitated individual meetings between CPC Corporation, Taiwan, and two leading U.S.-based SAF companies—Gevo and LanzaJet—to explore future collaboration opportunities in SAF production, particularly through Alcohol-to-Jet (ATJ) technology.

These high-level discussions were initiated in response to a policy directive from Taiwan's Ministry of Transportation, which mandates that all national airlines incorporate at least 5% SAF into their fuel mix by 2030. To meet this ambitious target, Taiwan's SAF demand is projected to reach approximately 240,000 metric tons annually by 2030, with continued growth anticipated in the years ahead. Despite strong policy support, Taiwan faces a critical feedstock shortage. The Ministry of Environment estimates that the island generates only 80,000 metric tons of used cooking oil (UCO) annually, of which just 60,000 tons are considered suitable for SAF production after filtration—far below the volume required to meet future national demand.

As a state-owned enterprise with a mission to support national energy goals, CPC Taiwan has recognized the urgent need to develop alternative feedstock sources and diversify production technologies. In this context, Alcohol-to-Jet (ATJ) technology has emerged as a promising and strategic pathway, capable of leveraging renewable alcohol such as ethanol to produce SAF at scale.

The goal of these meetings was to gain deeper insights from Gevo and LanzaJet into the technical and economic feasibility of ATJ-SAF production. Discussions focused on plant design, capital investment requirements, land and infrastructure needs, feedstock specifications, and operational considerations. Both companies shared valuable expertise based on their experience with commercial-scale ATJ projects in the United States and abroad.

By facilitating these dialogues, the USGC aims to support Taiwan's broader energy transition and deepen U.S.-Taiwan cooperation on clean energy innovation. These meetings mark an important step toward evaluating the viability of establishing an ATJ-SAF facility in Taiwan—one that could help ensure a more sustainable, secure, and locally integrated aviation fuel supply in the coming decade.

MARKET INFORMATION

Formosa Petrochemical & SAF Expansion

Formosa Plastics began producing and selling 5,500 tons of SAF in 2025. The company is applying to lift restrictions on importing used cooking oil to scale up SAF production to 50,000

tons annually. It also plans to import 300,000–400,000 tons of U.S. ethane annually to produce 300,000 tons of ethylene, with infrastructure upgrades expected by early 2027.

China Airlines & TSMC SAF Partnership

On World Environment Day, China Airlines and TSMC launched Taiwan's first corporate SAF carbon reduction program. Since April 2025, China Airlines has used domestically produced SAF on international flights from Taoyuan. TSMC supports the initiative through its business travel, and both companies share carbon reduction benefits via a carbon offset mechanism.

SAF Supply Goals & Government Policy

The Ministry of Transportation and Communications aims for airlines to use 5% SAF by 2030. Formosa Petrochemical targets 5,500 tons of SAF production in Q2 2025. CPC Corporation is preparing for trial production of 15,000 tons in Q3 2026, with future expansion depending on policy.

Formosa Petrochemical on Raw Material Needs

Chairman Tsao Ming emphasized that Taiwan lacks sufficient domestic raw materials for SAF production. He advocates for importing waste cooking oil to support HEFA-based pure biofuel production.

China Airlines SAF Procurement Plan

China Airlines signed an MOU with Formosa Petrochemical in April 2025 to purchase over 2,500 tons of SAF. It plans to buy over 10,000 tons in the next three years, aiming to cut emissions by ~6,500 tons. SAF blending targets: 2% in 2025, 5% in 2030, 40% in 2040, and 65% by 2050.

AmCham Taiwan White Paper

The American Chamber of Commerce in Taiwan urged the government to improve policy clarity and administrative efficiency, promote investment in carbon capture, low-carbon fuels, and clean energy, and ensure transparency and stakeholder engagement in legislation.

EV Decarbonization Plan

The Ministry of Transportation and Communications is drafting a NT\$45.8 billion plan (2026–2030) to electrify commercial vehicles. Strategies include subsidies for vehicle purchases, charging infrastructure, and domestic industry support. It also increased subsidies for electric scooters. An extra NT\$1,000 is offered for scrapping gas scooters over 10 years old. The goal is to retire 60,000 gas scooters within a year.

Japan Regional Update

PROGRAM REPORTS

The Council educated opinion leaders and media reporters about ethanol through a media team to the U.S.

The Council brought a team of media reporters from public broadcasters, key nationwide news, and weekly business journals to the United States to obtain fundamental information on the ethanol industry, corn production and use as a feedstock for ethanol and sustainable aviation fuel (SAF) production from June 1 to 7, 2025. The team was briefed about corn and ethanol production by Illinois Corn and learned about LCA from Professor Steffen Mueller. The group learned about sustainable farming practices and visited a gasoline retailer. In D.C., the team had industry group meetings with USGC, NCGA, Growth Energy and RFA to follow up their knowledge obtained from their stops in the field. The group also had an opportunity to meet with Congress staffers. The wide range of meetings and visits contributed to learning about the role of ethanol in mitigation of global warming, environmental benefits of ethanol, and ample supply of corn for food, feed and fuel use.

The Future of Bioethanol for Automobiles -Aiming at the introduction of E20 by 2040-Conference

The Council co-hosted a conference entitled “The Future of Bioethanol for Automobiles -Aiming at the introduction of E20 by 2040- “with the Institute of Applied Energy (IAE) in Tokyo on June 19, 2025. The conference was attended by approximately 200 industry stakeholders. Nine experts and leaders from METI, the auto-manufacture industry, and the petroleum industry as well as the Council and IAE gave presentations at the conference. The conference aimed to disseminate information to society about the introduction of bioethanol, to deepen the understanding about the significance of the introduction of bioethanol and technical issues in each related industry, and to exchange opinions among the stakeholders.

Two mascot characters debut in front of key Japanese liquid fuel stakeholders



Two mascot characters for U.S. corn ethanol promotion made their debut after the reception of the conference for the future of bioethanol for automobiles on June 19, 2025. The Council has been utilizing the two characters in the public targeted website for ethanol promotion since early 2025. The two mascot characters are expected to appear in key events for the public to gain the popularity of U.S. corn ethanol.

MARKET INFORMATION

Japan's ethanol imports in May 2025 (gallon)

Import of Ethanol in Japan						
May-24						
(Unit: gallon)						
	Total import	Total import	Import from US	Import from US	US Market Share	HS Code
	May-24	Jan. to May, 2024	May-24	Jan. to May, 2024	(%)	
Industrial						220710
Industrial	4,231,972	35,687,212	0	0	0.0%	220710121
For EtAc	1,195,042	4,169,732	0	0	0.0%	220710122
For EtAm	399,730	1,268,122	0	0	0.0%	220710123
Other	1,959,459	8,355,132	334,528	2,944,566	35.2%	220710199
Denatured	798	798	0	0	0.0%	220720100
Industrial Total	7,787,003	49,480,996	334,528	2,944,566	6.0%	
Fuel						
	0	2,599,816	0	2,599,816	100.0%	220710191
Excl Beverage Total:	7,787,003	52,080,812	334,528	5,544,381	10.6%	
Beverage	5,130,896	26,081,779	272,208	3,179,741	12.2%	220710130
Incl Beverage Total:	12,917,899	78,162,591	606,735	8,724,123	11%	
ETBE	46,071,960	210,969,000	46,071,960	210,969,000	100.0%	290919010
As Ethanol Equivalent	19,520,689	89,387,565	19,520,689	89,387,565	100.0%	
Fuel Total (As Ethanol):	19,520,689	91,987,381	19,520,689	91,987,381		

South Asia Regional Update

MARKET INFORMATION

India:

- As of May 31, 2025, India achieved a blending rate of 18.76 percent, according to the Indian government. Blending was comprised of 5.72 billion liters of ethanol from November 2024 through May 2025. Total supplies procured in this period were 5.499 billion liters of ethanol. The sugar sector, by way of ethanol made from cane juice and b-heavy molasses, sacrificed 2.893 MMT of sugar. The Indian government released more rice from Food Corporation of India warehouses, and ethanol supplies from rice jumped from 0 percent in February 2025 to 7.42 percent in May 2025. Forty percent of ethanol supplies are made from corn. At this time 5.844 MMT of corn has been used, and of the 5.2 MMT of rice allocated, 1.17 MMT has been used.
- The demand for blended gasoline in ethanol supply year (ESY) 2024/25 is projected to be 58.3 billion liters and will require 10.2 billion liters of ethanol for a 20 percent blend. Allocations have been given for 10.52 billion liters of ethanol, and 10.47 billion liters have been contracted. For ESY 2025/26 blended gasoline demand is projected at 61.6 billion liters and will require 10.3 billion liters of ethanol for a 20 percent blend.

South Korea Regional Update

PROGRAM REPORTS

2025 SAF (ATJ) Advisory and Industries Team

The Council sponsored an eight-member of 2025 SAF (ATJ) Advisory and Industries Team travel to Chicago, Atlanta and Sioux Falls from June 22 (Sun) to June 29 (Sun). The team consisted of five members from the Refiners, one from Korean Air, one SAF advisors Committee member and a Council escort.

The purpose of this team's visit to the United States is to widely inform the Korean government and the oil refining industry of the feasibility of corn ethanol based ATJ technology as an alternative to HEFA technology, which is expected to have great difficulties in securing raw materials in the mid- to long-term, and the economic feasibility due to abundant raw materials, and to create a demand base for expanding U.S. ethanol exports to South Korea in the future. The team's itinerary included visits to corn farms, ATJ SAF production plant, U.S. airline, Hartsfield-Jackson Atlanta International Airport, ethanol production and distribution facility, and meetings with ethanol and SAF experts in the U.S.

The program provided participants with an opportunity to meet with experts across the supply chain from low-CI corn farmers to ATJ SAF production technology companies, airlines, and other SAF stakeholders, and to get an update on the latest SAF policies and ATJ technologies in the United States and learn about the economics and competitiveness of corn ethanol-based SAF.

Attended 2025 Korea Biofuels Forum Workshop

July 3 – 4, Ramada Suite & Hotel, Pyeongchang

Korea Director attended the Korea Biofuel Forum (KBF) Annual Symposium held in Pyeongchang on July 3rd and 4th. During the two-day symposium, Korea Director had the opportunity to strengthen ties with the KBF Executive Board and explain to the KBF members the necessity of introducing road bioethanol policy and the opportunities of ATJ SAF. The Korea Biofuel Forum will co-host a bioethanol promotion conference in Korea with the Council and actively participate in the bioethanol program conducted by the U.S. Grains Council.

MARKET INFORMATION

U.S. ethanol imported in Jan-May down 6.7% year-on-year to 27.5 million gallons

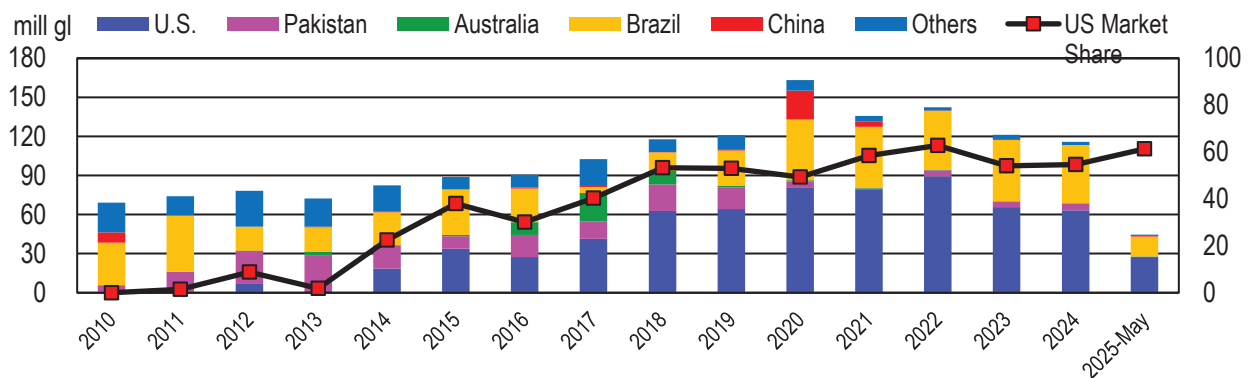
South Korea's total ethanol imports were 44.8 million gallons, down 8.6 percent from the same period in 2024. Of the total ethanol imports, 26.4 million gallons, 58.9 percent, were used for industrial purposes, and 18.4 million gallons, 41.1 percent, were used for beverage alcohol. Meanwhile, U.S. ethanol imports amounted to 27.5 million gallons, accounting for 61.3 percent, down 6.7 percent from the previous year. Most of the ethanol imported from the United States is consumed for industrial use. And Brazilian ethanol was imported at 15.2 million gallons, up 0.4 percent from the previous year. 0.9 million gallons were imported from South Africa and 1.2 million gallons from other countries. These import statistics do not include the volume of transshipment exports of U.S. ethanol through the bonded area of Ulsan Port.

The decline in imports of industrial US DDGS is due to the impact of decreased consumption, such as the construction recession, and the impact of Chinese ethyl acetate, which has nearly doubled since the abolition of dumping duties on Chinese ethyl acetate in 2024. Imports of Chinese ethyl acetate amounted to 9,428 tons in January-May 2023 but increased to 20,588 tons in the same period in 2025. Nevertheless, it is unlikely that US industrial ethanol exports to South Korea will decline further, and exports are expected to remain at a similar volume to last year until the end of the year.

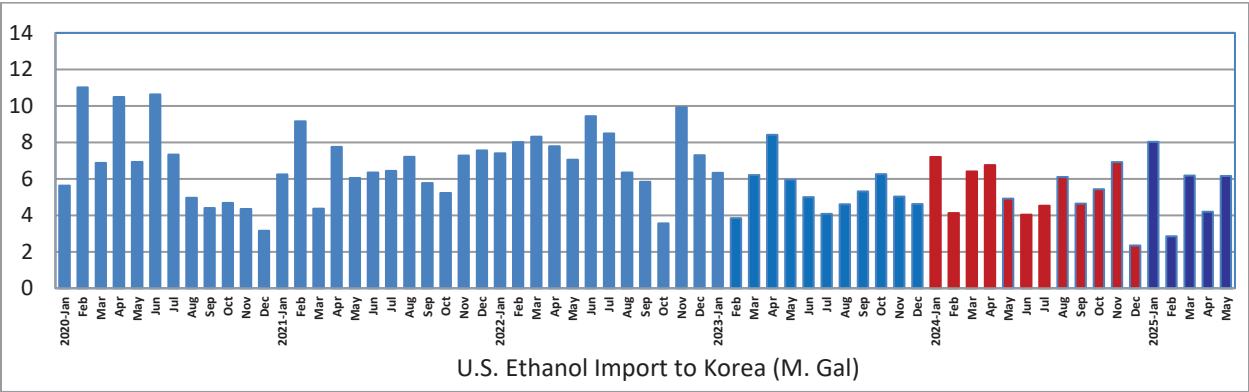
Korea Biofuel industry is concerned about the supply of UCO (Used Cooking Oil) due to the surge in exports to the U.S.

As the U.S. refineries (Chevron, Phillips 66, Diamond Green Diesel) that have been blocked from importing Chinese UCO are significantly expanding UCO imports from South Korea, Korea biofuel manufacturers and refineries are expressing concerns about producing biodiesel and SAF. Recently, the price of used cooking oil has also increased by about 50% from 900-1,000 won a year ago to 1,500 won per liter. In the first half of this year, 95,312 tons of used cooking oil were exported, of which 67,496 tons, or 77%, were exported to the United States. This is because the United States imposed a 125% tariff on Chinese UCO in April, and the Chinese government also abolished the 13% customs refund system for UCO exports. Until last year, there was no export of Korean used cooking oil to the United States. Currently, Korea is implementing a 4% biodiesel blending mandate and, with the 1% SAF blending mandate set to be implemented in 2027, Korea's biodiesel production industry and refineries are concerned about the upcoming UCO supply crisis.

U.S. Ethanol Imports, 2010 – May 2025



Monthly U.S. Ethanol Imports, 2020-May 2025



China Regional Update

MARKET INFORMATION

New Phase of U.S.– China Trade Relations

After months of heightened tensions and reciprocal trade measures, China and the US have entered a tentative phase of easing in their economic relationship. The three rounds of trade talks held in Geneva, London, and Stockholm, between May and July 2025, did not yield a comprehensive agreement, but they produced incremental progress: an initial 90-day tariff truce, mutual suspension of non-tariff retaliatory actions, a framework for structured dialogue, and a renewal of through November 10, 2025.

These developments, while modest and limited in scope, have helped de-escalate immediate risks and created space for more substantive negotiations on key issues where consensus remains elusive—fentanyl-related tariffs, export controls on chips and rare earths, market access, and the bilateral trade gap. The truce buys time, but not certainty. Its value lies in enabling a shift from reactive escalation to structured engagement. Yet the path forward remains uncertain, shaped by domestic political imperatives, strategic competition, and global economic volatility.

July 2025 Monthly Management Report

Middle East, Africa & Europe Regional Update

PROGRAM REPORTS

U.S. Bioethanol Webinar Series, Lagos and Abuja, Nigeria, July 1-3, 2025

With the support of MEMAN (Major Energies Marketers Association in Nigeria) and Africa Practice, the U.S. Grains & Bioproducts Council sponsored Bioethanol for transport hybrid technical seminars for Nigerian stakeholder groups (PETROAN, NNEL, IPMAN) with the active participation of USGBC Regional Ethanol consultant, Gbenga Apampa, as well as the technical USGBC experts, Rowena Torres-Ordonez and Kristin Moore, to provide key stakeholders with the information required to transition to an E10 biofuel mandate.

12th GBEP Bioenergy Week, July 7-11, 2025, Kampala, Uganda

To further promote ethanol's position in the global energy transition, USGBC Director of Global Ethanol Export Development Alicia Koch traveled to Kampala with Gbenga Apampa, UGBC MEA regional ethanol consultant, to attend the 12th Global Bioenergy Partnership's (GBEP's) Bioenergy Week.

The 12th edition featured 5 days exploring key issues related to development of bioenergy across Africa. The current year's theme was "Sustainable bioenergy for a just and inclusive energy transition. Amongst other dignitaries, H. E. Mauro Massoni, ambassador of Italy to Uganda, Rwanda and Burundi (currently GBEP Co-Chair) gave opening remarks.

Alicia Koch also represented the USGBC in a roundtable on developing sustainable biofuel markets with a presentation titled 'Bioethanol for decarbonizing the transport sector and increasing access to energy.

The Council's support of the Bioenergy Week highlights the organization's commitment to renewable energy in Africa and beyond, providing a global platform to discuss ethanol's positive impact on human health and the environment.

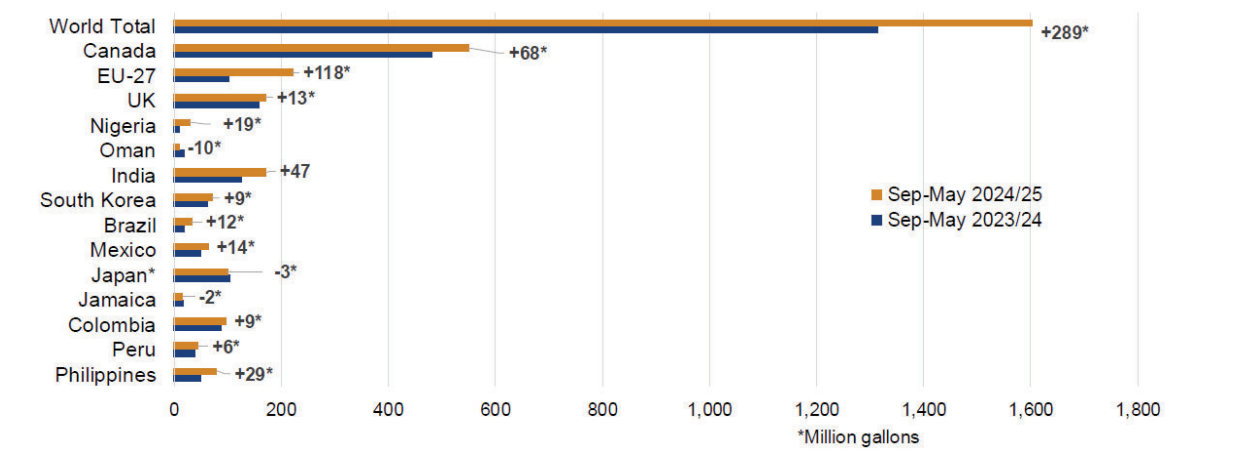
MARKET INFORMATION

Ethanol Exports:

The U.S. exported 173.67 million gallons of ethanol in June, according to data released by the USDA Foreign Agricultural Service on August 5, 2025. Exports were down 6% from May's 184.67 million and 19.1% over the June 2024 sum of 145.87 million gal.

Canada has imported 350.31 million gal through the first six months, nearly 33% of total U.S. shipments. Behind Canada in June was India, which imported 24.23 million gal, followed by the Netherlands, which took about 17.58 million gal.

It's worth noting that the EU and UK are remaining an important ethanol export destination market for the MY 2024/2025 as per the chart below.



Exports of U.S. ethanol total over 1.6 billion gallons in MY 2024/25, up 22% from last MY. EU, India, & Philippines continue with notable growth, while Canada remains the dominant market.

Europe:

EU

On July 2nd, 2025, the European Commission (EC) published a legislative proposal for the EU's 2040 climate targets. The proposal aims to reduce net greenhouse gas (GHG) emissions by 90% by 2040, compared to 1990 levels. It sets a framework for achieving this EU-wide binding target.

UK

Vivergo Fuels, the UK's largest bioethanol plant, has taken delivery of its last scheduled load of wheat, raising concerns for the site's future.

The latest development comes in the wake of the UK-US trade deal that removed a 19% tariff on US ethanol imports. Domestic wheat growers now face losing a major purchaser of feed wheat, which has accounted for more than 1MMT of wheat each year from over 4,000 UK farms.

While Greenergy will begin consultation on a proposal to cease production at its biodiesel plant in northeast England.

Finland

Finnish renewable fuel producer Neste has signed a deal with DHL Express for the supply of 7,400 metric tons of unblended sustainable aviation fuel (SAF) at Singapore Changi airport. Deliveries will commence this month, stretching until June 2026.

Italy

Italian energy company Eni and the European Investment Bank (EIB) have signed a €500 million (\$587 million) finance agreement to convert the 90,000 b/d Livorno refinery into a 500,000 metric tons/year biorefinery to meet the growing demand from the transport sector for biofuels in Europe.

Netherlands

Oil major Shell remains reluctant to resume a project to build a large biofuels production plant in Rotterdam due to excess supply in the market.

U.S. - EU framework agreement

On July 24th, the European Commission adopted a regulation to merge two countermeasures lists that included the following duties for grains and ethanol:

- 25 % on corn as of August 7
- 30 % on ethanol as of September 7
- 25% on DDGS & CGF as of August 7
- 30 % on barley as of September 7
- 30 % on sorghum as of September 7

However, the meeting between President Trump and Commission President Von der Leyen that resulted in a 'handshake' trade deal on July 27, 2025, with a 15 percent tariff on imports from the EU to the U.S. put a hold on these. Even though the details have not yet been provided, the parties are working on a Joint Statement expected to be released on the week of August 4th. Regardless, on August 5, the European Commission announced a delay on its countermeasures by 6 months.

Why is it important: even though the details have not yet been released, the initial agreement and the delay on the countermeasures provide hope and some certainty regarding the duties to be paid by the European importers for feed grains and co-products in the coming months.

Middle East:

Egypt

The Egyptian government is set to launch a used cooking oil collection network across the country to support domestic production of sustainable aviation fuel, according to a local media report.

The government has decided to establish 30 UCO collection and processing plants that will be used to produce SAF at a 120,000 mt per year plant in Alexandria, set to become operational in 2028, EnterpriseAM reported.

Africa:

Nigeria

Nigeria's privately-owned Dangote is considering expanding nameplate capacity at its refinery near Lagos to 700,000 b/d from 650,000 b/d, as per the executive director.

The Dangote refinery started operations in early 2024, and after a slow ramp-up receipts of crude are 644,000 b/d to date in July, according to Kpler. This makes it likely the refinery will surpass the monthly record of 445,000 b/d set in June.

Gasoline sales from the refinery began in September.

The refinery was buying more naphtha to boost gasoline output and has already crossed 120% of the nameplate capacity of the mild hydrocracker, 125% of capacity at the RFCC gasoline

desulfurization unit, 106% of capacity at the continuous catalytic regeneration unit, 140% of capacity in the Penex process, and 143% of capacity at the naphtha hydrotreater.

Mexico Regional Update

PROGRAM REPORTS

Follow up MOU E85 in Monterrey

As part of the ongoing efforts to advance the Flex Fuel (E85) initiative in Mexico, a meeting was held with the Nuevo León state government, involving the Secretaries of Environment and Transportation, as well as the Mobility and Accessibility Institute (IMA). The environment ministry, currently undergoing leadership transitions, recently created the Metropolitan Area Commission (CAME) to address Monterrey's air quality through potential carbon market measures and emission compensation programs. The transportation ministry is focused on completing subway stations ahead of the 2026 World Cup but acknowledged the potential of E85 to reduce air pollution, while pointing out regulatory and infrastructure challenges and the need to amend state law to allow E10 gasoline blends.

MARKET INFORMATION

Secretary of Energy talks with the US to promote energy security

Secretary of Energy Luz Elena González Escobar met with U.S. Ambassador to Mexico Ronald Johnson to discuss opportunities for cooperation in promoting development and energy security in the North American region. Also present at the meeting were Undersecretary of Planning and Energy Transition Jorge Islas Samperio, Federal Electricity Commission (CFE) Director General Emilia Callejas Alor, and U.S. government officials.

New Energy Reform Could Catalyze Biofuel Production in Mexico

Mexico's 2024 Energy Reform and the newly enacted Biofuels Law passed in March open the door to reviving bioethanol and biodiesel projects—initiatives previously sidelined by the dominance of Pemex. Global demand for biodiesel and bioethanol is expanding rapidly, with an estimated market value of USD 141 billion and annual growth of 4.2%. Mexico, meanwhile, relies almost entirely on imports, amounting to USD 83.7 million during the first quarter of 2025.

Southeast Asia & Oceania Regional Update

RAPP UPDATE

- Southeast Asia Commercial & Technical Trade Team Engagements – ongoing
- Widening Stakeholder Engagement & Global Event Influence – ongoing
- Indonesia E7 Promotion, Implementation, & Nationwide Development – ongoing
- Viet Nam Nationwide Scaling to E10 Adoption – ongoing
- Philippines E20 Commercial Implementation & Mandate Creation – ongoing
- SE Asia Emerging & Frontier Market Development & Engagement – ongoing

PROGRAM REPORTS

Indonesia:

Restructuring of Pertamina Leadership

During the General Shareholders Meeting (RUPS) held on 12 June 2025 in Jakarta, Pertamina formalized a significant board refresh aligned with the government-led consolidation under the Danantara energy holding initiative.

Executive Leadership Appointments

- President Director (CEO): Simon Aloysius Mantiri remains in position, ensuring continuity during the strategic transition phase
- Deputy President Director: Oki Muraza, formerly Senior VP of Research & Technology Innovation at Pertamina Holding, has been elevated to this post, replacing Wiko Migantoro. This change marks a notable generational shift and reflects Prioritization of tech-driven leadership

The refreshed leadership reflects an internal promotion strategy, especially emphasizing technological innovation and talent development (e.g., Oki Muraza's ascension) as Pertamina doubles down on sustainability and the energy transition agenda.

Meanwhile, on 8 July 2025, RUPS also announced a reshuffling of the leadership of Patra Niaga.

- President Director (CEO): Mars Ega Legowo Putra appointed as permanent CEO, replacing Riva Siahaan—who had previously been removed amid a corruption investigation and had served as acting CEO prior to formal confirmation.
- Vice President Director: Achmad Muchtasyar, former Director General of Oil & Gas at the Ministry of ESDM, appointed to this newly created position
- Full New Board of Directors:
 - Finance Director: Mega Satria (previously Finance Director at PT Pelabuhan Indonesia, replacing Arya Suprihadi)
 - Director of Central & Commercial Marketing: Alimuddin Baso (new role)
 - Director Regional Marketing: Eko Ricky Susanto (previously VP Retail, now in new role)

- Director of Land Engineering & Infrastructure: Hari Purnomo (new appointment, replacing Eduward Adolof Kawi)
- Director of HR & Business Support: Putut Andriatno (new appointment replacing Mia Krishna Anggraini)
- Director of Risk Management: Rahman Pramono Wibowo (retained)
- Director of Planning & Business Development: Harsono Budi Santoso (retained)

Malaysia Update:

Engagement with Ministry of Finance (MOF)

With the implementation of the Sales and Service Tax (SST) on July 1, 2025, the Council engaged the Ministry of Finance (MOF) on behalf of the Malaysian feed and livestock industry, as well as U.S. exporters, to discuss the negative impacts on trade. In the same engagement, the Council also raised concerns regarding high import tariffs and excise duties applied to denatured ethanol. A primary concern raised by MOF was the possibility of misuse for alcoholic beverages.

The Council explained that denatured ethanol is rendered toxic and unfit for human consumption through a load port process prior to export from the U.S., eliminating the risk of diversion. As a follow-up, the Council will submit a formal letter to MOF to further outline the case for exemptions and provide preliminary information on the value proposition of denatured ethanol for Malaysia's transport sector.

MyAero Sustainable Aviation Symposium

The MyAERO Sustainable Aviation Symposium, held in Putrajaya, Malaysia, convened policymakers, fuel producers, aviation leaders, and sustainability groups from across the Asia-Pacific to align strategies on Sustainable Aviation Fuel (SAF). The event emphasized Southeast Asia's unique biomass potential and the need to accelerate development of SAF supply chains, policy frameworks, and financing models. As a silver sponsor, the Council also brought a delegation of SAF stakeholders from Vietnam, the Philippines, and Indonesia, facilitating regional knowledge exchange and highlighting country-level initiatives such as pilot SAF flights, infrastructure upgrades, and regulatory roadmaps.

Discussions underscored the region's growing momentum for SAF adoption, with Malaysia positioning itself as a potential hub, Singapore advancing an innovative passenger levy model, and countries such as Vietnam preparing for CORSIA compliance in 2026. Industry leaders highlighted both the promise and the challenges of scaling, pointing to palm residues, forestry waste, and other non-food feedstocks as viable pathways. Technology providers presented options ranging from HEFA to ATJ, with integration innovations to lower carbon intensity. At the same time, producers acknowledged cost barriers, certification requirements, and the need for clear and harmonized policies to unlock investment.

The main takeaways were that SAF is widely recognized as the only near-term scalable decarbonization pathway for aviation in the region, while hydrogen and electric propulsion remain longer-term solutions. Southeast Asia is particularly well-positioned through its feedstock base, but policy harmonization, investment certainty, and proof-of-concept ATJ projects remain critical. Stakeholders agreed that scaling SAF will depend on effective alignment between

governments, financiers, and industry, with continued effort required to promote the ATJ pathway alongside more established HEFA models, given emerging feedstock constraints.

USGBC Engagements in Sarawak, Malaysia

The state of Sarawak hosted the International Energy Week (IEW), East Malaysia's largest international forum on sustainable energy. The event highlighted Sarawak's ambition to drive decarbonization through innovation and strategic planning, with a focus on natural gas, renewables, and carbon reduction initiatives. For the Council, IEW provided an opportunity to assess how ethanol can be positioned as both a near-term biofuel for road transport and a potential feedstock for Sustainable Aviation Fuel (SAF) in the state's energy transition.

Engagements with state-owned energy entities revealed that natural gas and LNG remain the dominant priorities, but pathways for diversification are emerging. Plans for methanol production, green hydrogen projects, and the development of a Low Carbon Hub in Kuching underscored Sarawak's intent to attract foreign investment and build a multi-fuel energy platform. While hydrogen remains the long-term focus, ethanol was recognized as an immediately deployable option for decarbonizing road transport, leveraging existing retail and terminal infrastructure.

Discussions also noted that Sarawak's broader aviation ambitions would create demand for SAF, with stakeholders acknowledging that the Alcohol-to-Jet (ATJ) pathway could play a critical role once current HEFA feedstock sources reach capacity. The Council's role in providing technical expertise, global case studies, and policy engagement was seen as valuable in shaping ethanol's inclusion within Sarawak's evolving energy roadmap.

Vietnam Update:

Petrolimex to Pilot E10 Sales in Ho Chi Minh City from August 1, 2025

The Vietnam National Petroleum Group announced it will pilot sales of E10 biofuel at selected stations in Ho Chi Minh City beginning August 1, 2025. The pilot program is intended to test consumer acceptance and technical readiness of distribution networks, providing a foundation for nationwide expansion. The Ministry of Industry and Trade (MoIT) is developing a roadmap for full nationwide adoption on January 1, 2026, as part of the government's broader efforts to reduce greenhouse gas emissions and achieve its 2050 net-zero target.

E10, defined under QCVN 01:2022/BKHCN as gasoline blended with 9–10% bioethanol by volume, offers both environmental and performance advantages. Domestic and international studies confirm that ethanol's high oxygen content improves fuel combustion, reducing carbon monoxide (CO) and hydrocarbon (HC) emissions compared to traditional gasoline. This lowers risks of air pollution and greenhouse effects while remaining compatible with most gasoline engines, including older models. More than 60 countries have already adopted E10, with mandates in the U.S. and Europe and a complete transition in the Philippines since 2018.

At its mid-year review of the petroleum market, MoIT reaffirmed its commitment to E10 as a strategic step toward phasing out conventional gasoline. Petrolimex has incorporated biofuel trading into its strategic development vision to 2035, positioning itself as a leader in green and

high-quality fuels backed by Industry 4.0 technologies. The group is upgrading retail infrastructure, expanding blending capacity, and strengthening partnerships with ethanol producers to secure stable supply chains. In parallel, it is also exploring longer-term options such as hydrogen and other renewable fuels.

Successful E10 implementation will require dedicated ethanol storage, refinery coordination, and updated technical standards. Petrolimex has called on MoIT to provide clear guidance and revised regulations to align with international specifications. The Vietnam Petroleum Association stressed the importance of publishing a roadmap with at least six months of lead time, along with revising outdated rules on fuel quality and market management. To support deployment, MoIT has instructed agencies to consider ethanol price subsidies, expand public communications, and extend distribution to rural and island regions. In addition to Petrolimex's efforts, PV Oil will also begin offering E10 RON95 at stations in Hanoi and Hai Phong starting August 1, 2025.

Philippines Update:

E20 Retail Workshop Follow-Up Engagements in Manila, Philippines

Building on the success of the Philippines E20 Retail Fuel Workshop, hosted in partnership with the Philippines Department of Energy (DOE) on 5 June 2025, the USGC SEA&O team travelled to Manila from 13-16 July 2025 to meet with key industry stakeholders and the DOE to further engagements demonstrating ethanol's technical readiness in these ecosystems and to establish long-term partnerships with the U.S. ethanol industry that align with Philippines clean fuel and energy security ambitions. USGC SEA&O will aid the fuel industry towards the commercial implementation of E20 with the goal of a mandate creation in the country.

Jetti Petroleum E20 Gasoline Retail Station Opening

The Philippines is the U.S.' largest ethanol trading partner in Southeast Asia, consuming nearly two billion gallons of gasoline per year. Ethanol production in the Philippines has increased by nearly 450% since its E10 mandate began in 2013, delivering significant economic benefits to rural communities, alleviating pump prices for consumers and reducing greenhouse gas emissions from the transportation sector by more than 1.75 billion pounds of carbon dioxide annually.

In June 2024, its government approved and promulgated a discretionary E20 policy in addition to the existing E10 mandate, further underscoring the country's commitment to being a global leader in biofuel production and utilization.

Jetti Petroleum Inc. held an official opening ceremony at its Roosevelt station in Quezon City, Manila and has invited the Council to attend. The Roosevelt station is the second retail station in the Philippines that offers E20 RON95. The Camarin station is the first to offer JXP-E20. The expansion in offering E20 by Jetti Petroleum is a strong support in part to the country's call for broader efforts to adopt more sustainable energy solutions, particularly through biofuels like ethanol as the government seeks to promote renewable energy, reduce greenhouse gas emissions, and enhance energy security.

The President of Jetti Petroleum, Mr Leo Bellas in his keynote speech spoke highly of E20 and thanked the Council for providing the support all these years for this becoming a reality in the Philippines. He also mentioned that they are expecting to open four to five more stations that will offer E20 RON95 at pumps later this year.

Other retailers like Seaoil are also planning on offering E20 at 3 of their new gasoline retail stations in the coming months.

Meetings with Philippines Ethanol Stakeholders

The Council met with senior officials from the Department of Energy to express appreciation for their support of recent ethanol workshops and to discuss upcoming initiatives, including the Global Ethanol Summit. Officials highlighted ongoing work to evaluate higher blend mandates such as E15 and requested additional technical and legal support to strengthen the case for implementation. It was also noted that bioethanol will feature in regional energy discussions when the Philippines chairs ASEAN next year, underscoring the growing importance of the issue in policy planning.

Engagements with fuel retailers reflected both challenges and opportunities for advancing ethanol use in the Philippines. Across discussions, stakeholders expressed appreciation for continued technical cooperation and were receptive to participation in international forums as part of the broader dialogue on ethanol adoption.

Pending Legislation on the Philippine Corn Industry

In the 20th Congress, several bills (HB 1947 – Philippine Corn Industry Development Authority Act, HB 957 – Philippine Corn Industry Development Act, and HB 1713 – Corn Industry Development Act of 2025) were introduced to strengthen the Philippine corn sector through new institutions, expanded funding, and policy reforms. Proposals include establishing either a Philippine Corn Industry Development Authority under the Department of Agriculture or a Corn Industry Development Committee under the Office of the President, with annual funding ranging from PHP 3–4 billion. Key measures cover production support, infrastructure, R&D, and marketing, with allocations for both yellow and white corn, the latter positioned as a rice substitute. Other provisions include lifting export restrictions, granting the President authority to adjust tariffs, and introducing mandatory review systems. Collectively, these bills reflect a push to modernize and scale the industry while addressing food security and market competitiveness.

MARKET INFORMATION

Oil Market Update

In July 2025, the average price of Brent crude oil was \$70.99 per barrel, falling slightly from \$71.46 per barrel in May 2025.

OPEC+ is preparing to fully unwind its 2.2 million b/d voluntary production cuts at the August 3 meeting, with a planned 548,000 b/d production increase for September. This decision would mark the completion of the current voluntary cuts, including a 300,000 b/d quota increase for the UAE. After this, OPEC+ is expected to pause before addressing the remaining 1.66 million b/d groupwide cuts, which remain in effect until end-2026. Market analysts warn of a potential Q4

2025 oversupply of 2 million b/d, which could pressure Dated Brent prices down to \$58/b by December. Price resilience so far has been supported by geopolitical risks, tariff negotiations, and Chinese strategic crude buying. Saudi Arabia exceeded its June quota, producing 9.54 million b/d, with the surplus placed into storage.

Overall sentiment points towards lower crude prices by the end of 2025. The U.S. Energy Information Administration (EIA) forecasts Brent crude to average approximately \$66–69/bbl in 2025, revised downward due to robust production growth and subdued demand; price is expected to decline toward near-\$60/bbl by late 2025, transitioning to a \$59/bbl average in 2026. Other agencies, including S&P Global and HSBC, forecast moderate softness: HSBC revised its forecast to \$68.50/bbl for 2025 and \$65/bbl for 2026, while JP Morgan sees Brent averaging \$66/bbl in 2025 and \$58/bbl in 2026. As a result, gasoline and MTBE prices are expected to follow accordingly, and this may negatively impact the economics of ethanol as a RON enhancer component for gasoline blending for non-mandate markets.

In regional news, the U.S. and Indonesia announced a new trade framework on July 22, under which Indonesia will remove nearly all tariffs on U.S. grains, soybeans, wheat, cotton, beef, pork, dairy, ethanol feedstocks, and industrial goods, while the U.S. will lower tariffs on Indonesian goods from 32% to 19%. The framework is linked to \$23 billion in planned purchases, including \$4.5 billion in agriculture, \$15 billion in energy, and \$3.2 billion for aircraft.

Additionally, GS Caltex is finalizing the AGPA Refinery Complex in East Kalimantan, with a capacity of 500,000 mt/year of bio raw materials for bio-jet fuel, bio-marine fuel, and biodiesel. The joint venture with POSCO International strengthens Indonesia's role in the global biofuel supply chain amid rising sustainability requirements from the EU and U.S.

In Malaysia, Dialog Group Berhad has announced a \$330 million expansion of its deepwater terminal in Pengerang, Johor, to provide dedicated storage and handling infrastructure for sustainable aviation fuel and other renewable fuels, marking a significant step in the country's energy transition strategy. The investment announced by company in a statement July 30 will be undertaken through Dialog's 25%-owned joint venture Pengerang Terminals, which signed a 25-year take-or-pay terminal usage agreement with Pengerang Biorefinery. The project will add about 272,000 cu m of new storage capacity and is slated for completion in the first half of 2028. The SAF and renewable diesel plant under construction at the adjacent Pengerang Integrated Complex will be capable of processing 650,000 mt of feedstock annually. The company said the investment aligns with its broader climate change strategy and supports national and global decarbonization efforts in the transport and aviation sectors. Dialog aims to position PDT as the largest integrated storage and logistics hub for petroleum and renewable fuels in the Asia Pacific region.

Taiwan Regional Update

PROGRAM REPORTS

Taiwan's Ethanol Gasoline Promotion Committee Advances E10 Research and Policy Communication

Taiwan Ethanol Gasoline Promotion Committee held its third meeting at the GIS MOTC Convention Center on July 17, 2025, chaired by Michael Lu, the Council's Taiwan Director. Representatives from government agencies, academia, research institutes, and industry gathered to review domestic and international findings on ethanol-blended fuels, with a particular focus on E10. Michael Lu reported recent engagements with Taiwan's Ministry of Economic Affairs (MOEA) and the American Institute in Taiwan, highlighting ethanol's inclusion in U.S.–Taiwan trade talks and its potential to reduce carbon emissions, enhance energy resilience, and balance trade.

Research updates from the Chung-Hua Institution for Economic Research (CIER) showed E10's potential to lower CO, NMHC, and particulate emissions, though aldehyde emissions could rise. Participants emphasized updating outdated domestic data, assessing impacts on motorcycles, and conducting comprehensive risk assessments, especially for health and environmental effects. Industry voices noted infrastructure and raw material challenges in electric vehicle (EV) adoption, arguing ethanol could complement Taiwan's carbon reduction goals while supporting rural transportation needs. CPC Taiwan reported ongoing emissions testing, finding variable NOx results and higher acetaldehyde levels with E10. The meeting concluded with agreement to consolidate CPC's latest data with international studies into a shared database. The fourth committee meeting, scheduled for September 30, will coincide with the visit of a U.S. Agriculture Trade Mission (ATM).

USGBC Strengthens Cooperation with CPC Taiwan on E10 and SAF Development

Michael Lu, the Council Taiwan Director, met with CPC Corporation, Taiwan's newly appointed Chairman, Mr. Fang Chen-Jen, on July 24. The meeting was also attended by senior CPC executives, including Ms. Liao Hui-Chen, Vice President; Ms. Chang Hui-Ping, Deputy Executive Director of the Petroleum Products Marketing Business Division; Mr. Yeh Yin-Te, Business Director; Dr. Tsai Ming-Chang, Director of the Refining and Manufacturing Research Institute (RMRI); and Ms. Shu-Li Wang, Section Chief.

Since the signing of the MOU on Technical Exchange and Promotion of Bioethanol Fuel on August 15, 2024, USGBC and CPC Taiwan have held multiple project meetings and technical exchanges focused on advancing the use of E10 ethanol gasoline and Alcohol-to-Jet (ATJ) sustainable aviation fuel (SAF) technology in Taiwan. The July 24 meeting served to present progress updates and engage in in-depth discussions on strategies for future cooperation.

Key achievements since the MOU signing include:

- August 2024 – Co-hosted the Taiwan-U.S. Sustainable Net-Zero Forum, with Executive Yuan Secretary-General Kung Ming-Hsin recognizing the value of bioethanol applications.

- October 2024 – Led a delegation to Japan for the International SAF and Biofuels Summit.
- December 2024 – Partnered with Yamaha Motor Taiwan to organize an E100/E10 scooter test-ride event, with CPC providing E10 gasoline and blends.
- March 2025 – Official launch of the Ethanol Gasoline and ATJ Technology Promotion Committee.
- June 2025 – Facilitated virtual SAF technical consultations between CPC Taiwan and U.S. innovators GEVO and LanzaJet.
- January–May 2025 – CPC’s RMRI conducted ethanol gasoline testing, including corrosion inhibitor performance, energy efficiency evaluations, anti-corrosion tests for fuel tanks and pipelines, and bottom-tank fuel quality assessments.

We had a great conversation and reached agreement as follows:

- Designating RMRI Director Dr. Tsai Ming-Chang to attend the Global Ethanol Summit in Washington, D.C., in October, followed by a field visit to Minnesota.
- Signing a Non-Disclosure Agreement (NDA) with LanzaJet to continue technical discussions and evaluations of ATJ technology to help meet Taiwan’s future SAF demand.
- Hosting a U.S. agricultural trade delegation in Chiayi for a site visit to CPC’s RMRI.
- Continuing engagement with the Ministry of Economic Affairs’ Bureau of Energy to seek policy support for ethanol gasoline adoption.

This visit reinforced the strong working relationship between USGBC and CPC Taiwan and marked another step forward in advancing low-carbon fuel solutions aligned with Taiwan’s energy diversification and carbon reduction goals.

U.S. Midwest Political Leaders Delegation Visits Taiwan to Strengthen Agricultural Cooperation

A delegation of political leaders from the U.S. Midwest visited Taiwan from July 22 (Tuesday) to July 27 (Sunday), 2025, to engage in exchanges on trade, economic, and agricultural cooperation. The delegation was composed of 11 high-ranking state officials and legislative leaders from Illinois, Indiana, Iowa, Wisconsin, Ohio, and Michigan.

On July 24, at the invitation of Taiwan’s Ministry of Foreign Affairs (MOFA), Michael Lu, the Council’s Taiwan Director, attended a luncheon with the delegation to discuss U.S.-Taiwan agricultural trade and cooperation. During the luncheon, Michael emphasized the critical role of U.S. corn in supporting Taiwan’s livestock and agriculture industries, briefed the upcoming 2025 Taiwan Agriculture Trade Goodwill Mission to the U.S. in mid-September co-organized by USGBC and MOFA Taiwan, and provided updates on USGBC’s ongoing policy engagement to promote the adoption of bioethanol in gasoline and SAF in Taiwan.

Delegation members expressed their appreciation for USGBC’s long-standing efforts in Taiwan to promote U.S. grains and co-products, recognizing its contributions to strengthening bilateral agricultural ties.

Delegation Members:

1. Ms. Amy Sinclair, President, Iowa State Senate (R)
2. Ms. Susana Mendoza, Comptroller, State of Illinois (D)
3. Mr. Lonnie Randolph, Indiana State Senator & Co-Chair, Taiwan Friendship Caucus, Indiana State Senate (D)
4. Ms. Stephanie Chang, Michigan State Senator & Co-chair, Taiwan Friendship Caucus, Michigan State Senate (D)
5. Mr. Willie Preston, Illinois State Senator & Senate Chair, Illinois Legislative Black Caucus, Illinois General Assembly (D)
6. Mr. Roger Victory, Michigan State Senator & Senate Minority Caucus Whip, Michigan State Senate (R)
7. Dr. C. Allison Russo, Minority Leader & Co-chair, Taiwan Friendship Caucus, Ohio House of Representatives (D)
8. Mr. David Abbott, Indiana State Representative, Honorary Member, Taiwan Friendship Caucus, Indiana House of Representatives (R)
9. Mr. Justin Slaughter, Illinois State Representative, Chairman, Judiciary Committee & House Chair, Illinois Legislative Black Caucus, Illinois General Assembly (D)
10. Mr. Jon Dunwell, Iowa State Representative, Assistant Majority Leader, Iowa House of Representatives (R)
11. Mr. Scott Krug, Wisconsin State Representative, Co-chair, Taiwan Friendship Caucus & Assistant Majority Leader, Wisconsin House of Representatives (R).

MARKET INFORMATION

USGBC participated in policy discussions, urging the government to adopt ethanol-blended gasoline as part of the transport sector's emissions reduction strategy. Taiwan's Ministry of Economic Affairs' Energy Administration responded that the main challenge of current E3 application remains vehicle compatibility for old cars and motorcycles, but the government intends to continue support for wider adoption.

Taiwan has designated 2025 as the "SAF Launch Year" to promote sustainable aviation fuel. However, domestic production capacity is still insufficient, largely due to the high costs and limited availability of raw materials, such as used cooking oil.

Formosa Petrochemical Corporation has emerged as a key domestic SAF supplier. It produces SAF using a co-processing technique, with waste cooking oil certified under international sustainability schemes (ISCC CORSIA). The company has entered agreements with major Taiwanese airlines:

China Airlines committed to procuring over 10,000 tons of SAF within three years, an effort expected to reduce carbon emissions by around 26,000 tons.

EVA Air secured more than 20,000 tons of SAF over five years, beginning in 2026.

Taiwan's major airlines, including China Airlines, EVA Air, and STARLUX, are also incorporating SAF-related cost adjustments into their operations, such as passenger fuel surcharges linked to international jet fuel market changes.

Taiwan is advancing a national Emissions Trading System (ETS). The Taiwan Carbon

Solution Exchange (TCX) signed an agreement with the European Energy Exchange (EEX), marking a step toward linking Taiwan's system with international carbon markets.

The Executive Yuan approved a third-phase national greenhouse gas reduction target of a 28% reduction by 2030 compared to 2005 levels. The Ministry of Environment has been engaging the public and stakeholders on strategies across multiple sectors.

Taiwan is preparing to implement a local version of the Carbon Border Adjustment Mechanism (CBAM). The framework includes product-level carbon emissions data and trial reporting mechanisms, with full implementation expected to begin in 2025.

Taiwan's carbon fee mechanism officially took effect, requiring businesses to pay based on emissions while offering discounts for high-risk industries if they submit approved voluntary emissions reduction plans. A review process has been set up to evaluate corporate applications and determine fee adjustments.

To support industry transition, the government launched a Green Growth Fund with an initial scale of NT\$10 billion, aimed at driving investment in net-zero industries and strengthening corporate capacity to respond to global carbon tariffs and supply chain decarbonization pressures.

Japan Regional Update

PROGRAM REPORTS

The Council traveled to Nagoya and Fukui to meet with Toyota Motors and Nakagawa Bussan for bioethanol promotion

The Council met with Mr. Hayashi from Toyota, who is planning to visit to the U.S. to learn about the current situation and prospects of carbon neutral fuel including synthetic fuel on July 15, 2025. Mr. Hayashi asked the Council for support in introducing and arranging appointments with potential visits. He is the chair of one of the task forces set up by METI. The Council will continue dialogue with Mr. Hayashi in the future.

MARKET INFORMATION

METI raises baseline CI value for gasoline and reduction target

On July 30, 2025, METI proposed a new carbon intensity (CI) value for gasoline. METI will raise the reduction target from the current provisional 55 percent to 60 percent of the gasoline CI value. The proposed baseline CI value will be updated from 88.74 gCO₂eq/MJ to 90.17 gCO₂eq/MJ. Additionally, the reduction target for GHG emissions from gasoline use will increase from the current provisional rate of 55 percent to 60 percent. For more details, please refer to Japan_JA2025-0039. The Council does not plan to take actions on the proposal but will watch the METI policy closely with FAS Japan.

Japan's ethanol imports in June 2025 (gallon)

Import of Ethanol in Japan						
Jun-25						
(Unit: gallon)						
	Total import	Total import	Import from US	Import from US	US Market Share	HS Code
	Jun-25	Jan. to Jun 2025	Jun-25	Jan. to Jun 2025	(%)	
Industrial						220710
Industrial	9,680,945	45,368,157	0	0	0.0%	220710121
For EtAc	666,169	4,835,901	0	0	0.0%	220710122
For EtAm	653,611	1,921,733	0	0	0.0%	220710123
Other	3,267,346	11,622,478	763,355	3,707,921	31.9%	220710199
Denatured	532	1,331	0	0	0.0%	220720100
Industrial Total	14,268,604	63,749,600	763,355	3,707,921	5.8%	
Fuel						
	2,369,827	4,969,642	2,369,827	4,969,642	100.0%	220710191
Excl Beverage Total:	16,638,431	68,719,242	3,133,182	8,677,564	12.6%	
Beverage	4,407,956	30,489,735	373,730	3,553,471	11.7%	220710130
Incl Beverage Total:	21,046,386	99,208,977	3,506,912	12,231,035	12%	
ETBE	40,275,312	251,244,312	40,275,312	251,244,312	100.0%	290919010
As Ethanol Equivalent	17,064,650	106,452,215	17,064,650	106,452,215	100.0%	
Fuel Total (As Ethanol):	19,434,477	111,421,857	19,434,477	111,421,857		

South Korea Regional Update

MARKET INFORMATION

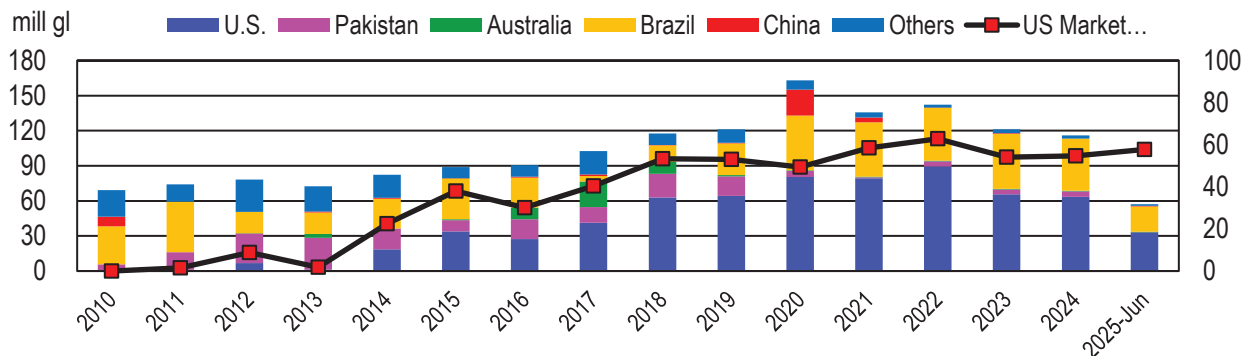
U.S. ethanol imported in Jan-Jun down 1.3% year-on-year to 33.0 million gallons

South Korea's total ethanol imports were 57.1 million gallons, down 3.7 percent from the same period in 2024. Of the total ethanol imports, 31.7 million gallons, 55.5 percent, were used for industrial purposes, and 25.4 million gallons, 44.5 percent, were used for beverage alcohol. Meanwhile, U.S. ethanol imports amounted to 33.0 million gallons, accounting for 57.8 percent, down 1.3 percent from the previous year. Most of the ethanol imported from the United States is consumed for industrial use. And Brazilian ethanol was imported at 21.6 million gallons, up 1.8 percent from the previous year. 1.0 million gallons were imported from South Africa and 1.5 million gallons from other countries. These import statistics do not include the volume of transshipment exports of U.S. ethanol through the bonded area of Ulsan Port.

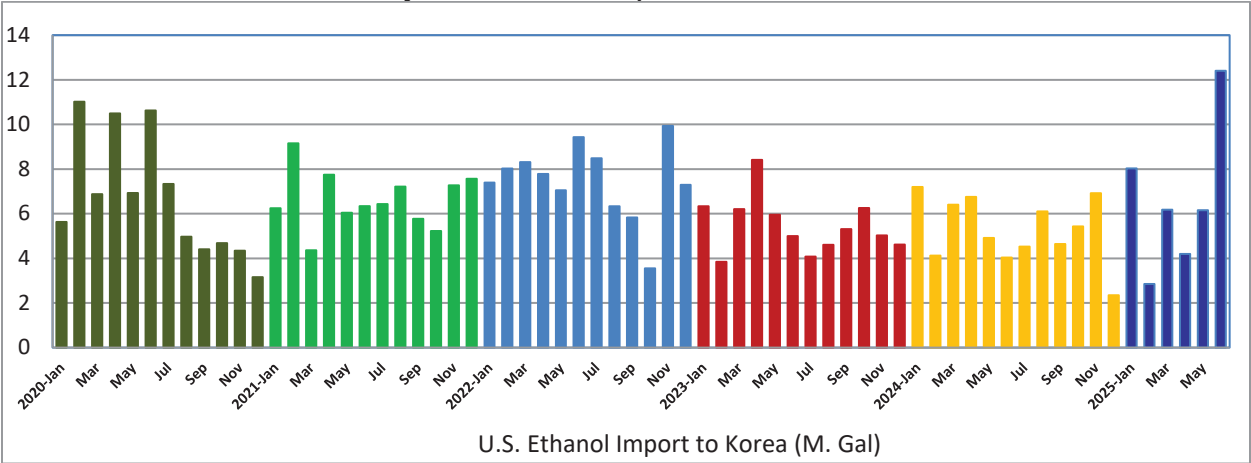
The decline in U.S. industrial ethanol imports to Korea is due to a decline in consumption, including a construction recession, and a near-doubling of imports of Chinese ethyl acetate, a major ethanol raw material, following the South Korean government's termination of anti-dumping duties. From January to June 2023, China's ethyl acetate imports were 12,885 tons, but increased to 25,493 tons during the same period in 2025. Nevertheless, US ethanol imports are gradually recovering, and exports are expected to surpass last year's levels by the end of this year.

Since the Trump administration took office, the USGBC, in collaboration with the USTR, has strongly encouraged the Korean government to adopt a mandatory blending standard for road ethanol. If the Korean government were to adopt a 10% blending mandate like the US, it would create 330 million gallons of new ethanol demand, worth approximately \$900 million. This would create significant new demand, equivalent to approximately 8-10% of Korea's agricultural imports from the US.

U.S. Ethanol Imports, 2010 – June 2025



Monthly U.S. Ethanol Imports, 2020 – June 2025



South Asia Regional Update

PROGRAM REPORTS

Council team travels to Dehradun to finalize consulting work with Indian Institute of Petroleum

In efforts to get alcohol-to-jet technology approved in India, the Council sent out a request for proposal (RFP) to develop a lifecycle analysis (LCA) for corn alcohol-to-jet technologies. The LCA will outline carbon scores on India's unique situation regarding corn farming, current ethanol production practices, and current available SAF production technology.

After sending out the RFP to various stakeholders around India, the Indian Institute of Petroleum (IIP) in Dehradun stood out as the clear candidate to take the project forward. Their political connections will allow for a proper rollout of the research, during which time the Council plans to advocate for India to come up with its own carbon scoring model for SAF. This is much like the U.S.'s approach with the GREET model.

In order to finalize the contract and some finer points of the research, Council staff traveled to Dehradun to meet with IIP executives and research heads. Following the meeting, a preliminary agreement was struck.

This initiative will be a cornerstone of the Council's SAF programming in India, as alcohol-to-jet adoption in India will serve many purposes. Not only will it allow the U.S. to have increased export opportunities for ethanol for SAF, but it will also increase India's ethanol and corn consumption, which will lead to increased opportunities to export ethanol for fuel blending and corn for various uses.

MARKET INFORMATION

India:

- As of June 30, 2025, ethanol supplies reached 6.37 billion, and 6.61 billion liters of ethanol were blended in gasoline. According to the Ministry of Petroleum and Natural Gas (MoPNG), 18.95 percent blending has been achieved. Of the total supplies, 41.8 percent of supplies are via corn; 24.48 percent via cane juice; 13.95 percent via b-heavy molasses and 1.72 percent via c-heavy molasses. 7.62 percent of ethanol has been supplied via damaged food grains and 10.42 percent via Food Corporation of India (FCI) rice. Overall, about 7 MMT of corn has been used to make ethanol and 1.51 MMT of FCI rice has also been used. Department of Food and Civil Supplies had allocated 5.2 MMT of rice for ethanol production in February 2025. India's current capacity of ethanol production is at 18 billion liters, with more investment going into grain-based ethanol.
- In 2024, India imported 679.738 million liters of denatured ethanol. 622.848 million litres (91.63 percent) was from the U.S., followed by Brazil at 7.53 percent. From January 2025 through May 2025, India has imported 330.472 million liters of ethanol, with U.S. market share at 97.38 percent (321.814 million liters). For this period, Brazil has not been

able to make a dent in the market. Current price offers range between \$670 to \$680/MT, and the prices have been stable for some time.

Sri Lanka

- Sri Lanka had stopped production of petrol and diesel in its refinery and was importing final products. Following the U.S. trade deal discussions and possibility of 30% tariffs on Sri Lankan products when exported to the U.S., Sri Lanka is willing to start its refinery again and use U.S. crude. There is a possibility of using U.S. ethanol also for blending will need to be seen as there was a plan in 2020 to blend ethanol in gasoline at 5 to 10 percent, but it fizzled out.

China Regional Update

MARKET INFORMATION

New Phase of U.S.– China Trade Relations

After months of heightened tensions and reciprocal trade measures, China and the US have entered a tentative phase of easing in their economic relationship. The three rounds of trade talks held in Geneva, London, and Stockholm, between May and July 2025, did not yield a comprehensive agreement, but they produced incremental progress: an initial 90-day tariff truce, mutual suspension of non-tariff retaliatory actions, a framework for structured dialogue, and a renewal of through November 10, 2025.

These developments, while modest and limited in scope, have helped de-escalate immediate risks and created space for more substantive negotiations on key issues where consensus remains elusive—fentanyl-related tariffs, export controls on chips and rare earths, market access, and the bilateral trade gap. The truce buys time, but not certainty. Its value lies in enabling a shift from reactive escalation to structured engagement. Yet the path forward remains uncertain, shaped by domestic political imperatives, strategic competition, and global economic volatility.

August 2025 Monthly Management Report

Middle East, Africa & Europe Regional Update

MARKET INFORMATION

Ethanol Exports:

The U.S. exported 48.6 million gallons of ethanol in July into Europe (UK & EU), according to data released by the USDA Foreign Agricultural Service. Exports were up from 30 million gallons in June but less than the 62.9 million gallons exported in May 2025. The volume was shared between 21.5 mill gal to the UK and 27.5 mill gal to The Netherlands. Total exports to EU and UK in 2025 were 287.4 mill gal, up by 33 percent compared to the same period last year.

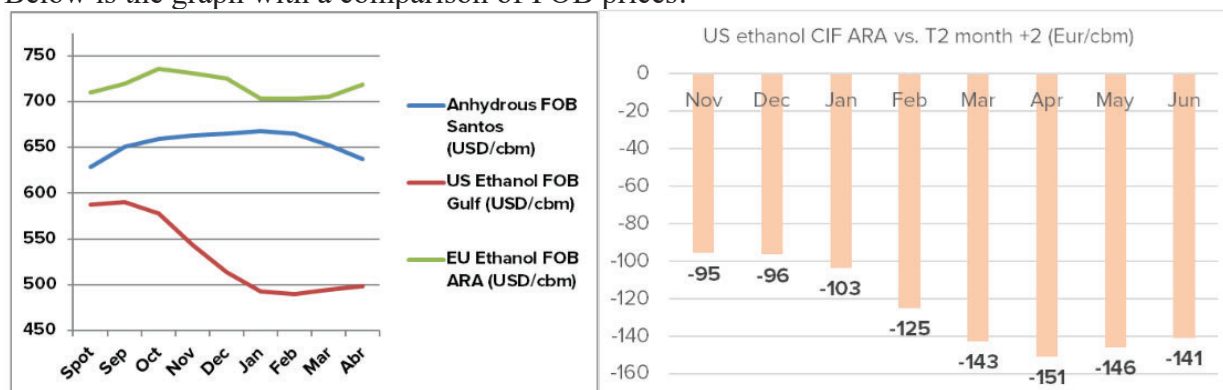
However, Brazil exported an immaterial 1.3 mill gal to the EU&UK during July and only hydrous ethanol for industrial or beverage use while zero volumes of fuel grade ethanol.

This small volume will be maintained, once Fob Santos values continue to trade at a significant premium of 0.38\$/gal vs Fob Gulf values making import economics into Europe only viable from the US.

U.S. exports to Middle East and Africa were zero during July 2025. Same from Brazil which exported zero volume of fuel grades to MEA during July. However, they did export 1,5 mill gallons of hydrous grades to Cameroon.

During July the discount of Fob Gulf prices vs. Fob Brasil remained around 0.38\$/gal in the front of the curve while it is even higher close to 0.57\$/gal in the back of the futures curve.

Below is the graph with a comparison of FOB prices:



According to the USGBC ethanol Consultant of Europe, export economics for 2025 have been trading positive and negative in the front of the curve, but overall allowing US players to hedge their export program forward. At the time of writing, economics have been negative for five months in a row which could have a negative impact on exports to the EU and UK starting in late Q3 and during Q4 2025. In any case, the European market is short and sooner or later prices will have to do the work to turn export economics positive. In the graph below the breakeven would be at T2-120 Eur/cbm, anything below that would be negative import economics.

It's worth noting that the European (EU and UK) ethanol Supply and Demand balance is very much oversupplied for two reasons: demand in Italy is not really picking up and increasing imports. This is resulting in margins trading below cost of production and that's why the import arbitrage has been negative during the last four months. Lower supply is needed, whether from producers or importers. The USGBC ethanol consultant expectations are for negative margins to remain until there is a reduction in supply.

The estimating EU and UK gasoline demand to grow by 3.25% during 2025 and ethanol blending to move up to 7.33% up from 7.14% last year. The higher blending is expected in France due to a higher mandate.

In France, gasoline went up by 6.9% year to July 2025, while ethanol blending was 11.5% same as the average of 2024.

While in Spain, the gasoline up by 7.9% year to July 2025, and ethanol blending continues poor at 2.7% up from 2.62% of the average of 2024.

In UK, gasoline went up by 5.4% year to June 2025 with ethanol blending of 8.7% up from 8.5% of the average during 2024.

Europe:

UK

UK rules out bioethanol industry bailout: The closure of Vivergo Fuels' bioethanol plant in Hull was confirmed in August following removal of the tariff on U.S. ethanol imports into the Kingdom.

Netherlands

A subsidiary of Shell, Nederland Raffinaderij, has opted against restarting construction of its planned biofuels facility at the energy and chemical park in Rotterdam, which had started three years ago.

Italy

Italy's Competition Authority has fined oil companies Eni, Esso, Q8, Saras, Tamoil and IP \$1.09 billion after finding the companies colluded on pricing biofuels. According to AGCM, its investigation, which kicked off in July 2023, had concluded that the companies coordinated to fix the value of the biofuel component in fuels between January 2020 and June 2023, during which time the price of the biofuel component rose from 8 cents/gal to 25.5 cents/gal.

Portugal

Consultation on RED III increases to renewable fuel targets: Portugal has launched a public consultation on new proposed targets for renewable energy use in the transport sector, including a large uplift for headline mandates and sector targets for maritime and non-electric railways. The proposed regulation, which transposes the EU's Renewable Energy Directive III into national law, would set the overall renewable energy use in transport at 29% from 2030 up from the current 16% target.

Africa:

Nigeria:

Nigeria's Dangote refinery exported its first shipment of fuel to the United States, with 320,000 barrels of gasoline arriving in New Jersey on 15 September, 2025. Global oil trader Vitol purchased the fuel from Mocoil Oil, selling the majority to American distributor Sunoco. Another two shipments are expected to arrive before the end of September.

Nigerian gasoline imports hit new record low in August (Argus):

Nigeria imported the lowest volume of gasoline on record last month, despite reports of a two-week turnaround at one of its key gasoline-yielding units. Seaborne gasoline arrivals into west Africa's largest economy dropped by roughly a quarter on the month to 105,000 b/d in August, according to vessel-tracking data from Kpler, setting a new record low after 116,000 b/d was recorded in June.

The Netherlands and Togo each accounted for around a third of deliveries to Nigeria. EU, UK and Norwegian-origin gasoline imports into Nigeria accounted for just 65,000 b/d last month, also the lowest on Kpler records stretching back to 2017.

The record low imports of gasoline cargoes last month defied dominant market sentiment that a two-week turnaround at Nigeria's 650,000 b/d Dangote refinery's RFCC unit could tighten regional supply in August. Benchmark non-oxy gasoline barge cracks to front-month Ice Brent rallied to \$15.92/bl in the month of August, the first month this year to record a year-on-year rise in gasoline refining profitability.

However, it appears that domestic Nigerian gasoline supply was little affected by the works, and that little buying interest emerged for foreign supplies. Market participants suggested that the Dangote refinery had ample gasoline in stock last month, cushioning a likely drop in output.

Indeed, European gasoline exports — of which Nigeria received 193,000 b/d in August last year — tanked to 879,000 b/d in August, the lowest on record for the month, according to Kpler, with a combination of subdued Nigerian import demand as well as lackluster US gasoline import demand, as domestic arbitrage saw the US Atlantic coast pull in more volume from the Gulf coast than from northwest Europe.

Offshore Lome — nominally Togo under vessel-tracking movements — is playing an increasingly greater function as a supply hub of swing gasoline barrels into west Africa since the Dangote refinery began gasoline production a year ago. Togolese deliveries last month were the highest since July 2020 and year-to-date Togolese arrivals in Nigeria accounted for a record-breaking 12pc of all gasoline imports into the country, up from 1.4pc last year.

Non-oxy gasoline margins have started September strongly, reaching 15-month highs of \$19.83/bl to front-month Ice Brent on 4 September. An outage at 285,000 b/d RFCC last week has supported a rise in gasoline cracks, according to one gasoline trader, besides tighter supply of gasoline blending component MTBE in northwest Europe. Gasoline imports into Nigeria stood at

134,000 b/d in the first week of September, according to Kpler vessel- tracking data, somewhat above August levels.

Comments: The Council is working closely with Dangote refinery's management and Nigerian Authority and private sector to reinforce E10 mandate and open the rooms for 400 mill gall of Ethanol exports into the country.

South Africa

2 percent Biofuel blending takes effect from August 12, 2025

On August 28, 2025, the Department of Mineral and Petroleum Resources of South Africa announced the publication of the Regulated Biofuels Price Regulations in the Government Gazette No. 11864. According to the regulation, a 2% biofuel blending into the total transport fuels supply takes effect as the first phase of the Biofuels Regulatory Framework 2020. The second phase of the Framework will have an increased biofuel penetration of 4.5%, to be implemented once the first phase is achieved.

Libya

Waha Oil — a joint venture between Libya's state-owned NOC, France's TotalEnergies and US firm ConocoPhillips — produced 282,000 b/d in 2024 and 280,000 b/d in 2023, according to central bank data.

State-owned NOC is locked in contractual talks with TotalEnergies and ConocoPhillips, which are seeking improved terms before advancing developments such as the 100,000 b/d North Gialo project and the 80,000 b/d NC-98 project. It raised crude output to a multi- year high of 365,000 b/d.

Waha Oil is central to Libya's long-standing goal of boosting crude production to 2mn b/d, up from around 1.4mn b/d.

Mexico Regional Update

PROGRAM REPORTS

Ethanol Market Development – Technical Mission to Guatemala

The USGC Mexico office organized a technical mission to Guatemala with six invited guests from the energy, agriculture, and academic sectors, in collaboration with LATAM Ethanol Consultant Federico Salcedo. Participants included senior officials from BUAP, CONADESUCA, and the Government of Tamaulipas, all with responsibilities linked to ethanol promotion and production. The objective was to strengthen understanding of ethanol production models, sustainability practices, and regulatory frameworks, providing insights directly applicable to Mexico's current policy discussions. This was one of the most significant missions in recent years, given Mexico's evolving bioethanol policy debate. The program addressed participants' main concerns and demonstrated practical pathways for scaling ethanol in Central America.

MARKET INFORMATION

Mexico's energy plan considers incorporating biofuels, experts say

The Mexican government has formally included biofuels in its energy plan, marking a significant step toward energy transition and emission reduction. Experts highlighted that ethanol blends derived from sugarcane and sustainable aviation fuel (SAF) using "Alcohol-to-Jet" technology could begin as early as 2027, creating rural jobs and reducing fossil fuel dependence. Although Mexico currently lacks a robust ethanol market—partly due to the annulment of a 2017 fuel quality regulation—the existing legal framework, including the Biofuels Law, Energy Transition Law, and Hydrocarbons Law, now explicitly supports these alternatives. The challenge will be to ensure sustainable production without affecting food supply while advancing the regulations and infrastructure needed to make biofuels a viable part of Mexico's energy mix.

Southeast Asia & Oceania Regional Update

RAPP UPDATE

- Southeast Asia Commercial & Technical Trade Team Engagements – ongoing
- Widening Stakeholder Engagement & Global Event Influence – ongoing
- • Indonesia E7 Promotion, Implementation, & Nationwide Development – ongoing
- Viet Nam Nationwide Scaling to E10 Adoption – ongoing
- Philippines E20 Commercial Implementation & Mandate Creation – ongoing
- SE Asia Emerging & Frontier Market Development & Engagement – ongoing

MARKET INFORMATION

Oil Market Update

In August 2025, the average price of Brent crude oil was \$68.21 per barrel, falling from \$70.99 per barrel in July 2025.

In August 2025, Brent crude prices softened overall as supply concerns dominated sentiment. OPEC+ confirmed it would add about 547 kb/d of production starting in September, which fed expectations of a looming surplus and put steady downward pressure on prices. At the same time, Russian refining outages—driven by drone strikes that knocked out a record share of capacity—added some support, tightening regional product supply. U.S. EIA data showing draws across crude, gasoline, and distillates also helped balance sentiment, but broader macroeconomic factors, including speculation about Federal Reserve rate cuts and fluctuations in the U.S. dollar, kept Brent trading within a restrained range.

Singapore gasoline MOPS prices fared better relative to crude, with gasoline refining margins remaining firm throughout the month. Hot weather in East Asia early in the month boosted consumption in Japan and Korea, while stronger pull from Malaysia further tightened Singapore balances. Regional trade flows also played a role, with MRPL issuing a gasoline export tender and Pakistan's refinery maintenance plus PSO's buying activity drawing more cargoes into the market. Additionally, disruptions in Russian refining capacity constrained global gasoline and diesel availability, indirectly supporting Singapore cracks. Overall, while Brent crude was weighed down by supply expectations, MOPS gasoline prices remained buoyant, supported by regional demand, trade flows, and tighter product availability.

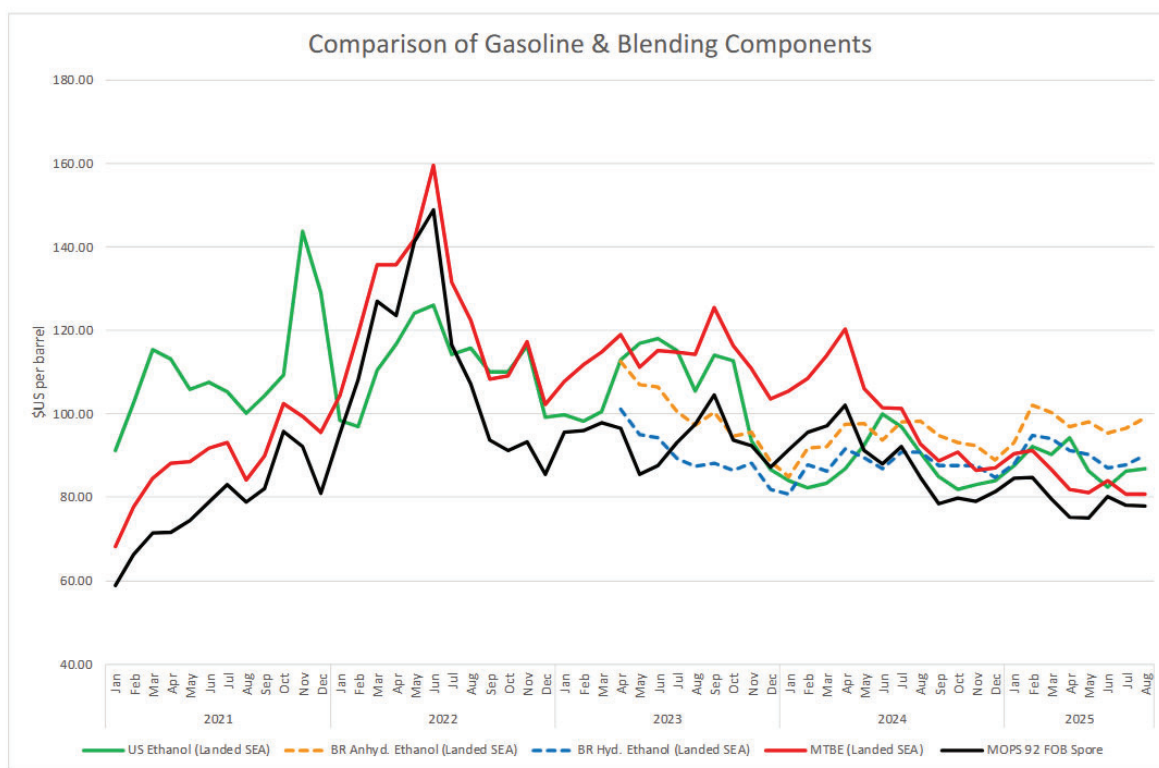
In SAF news, Pertamina's refinery unit PT Kilang Pertamina Internasional (KPI) has delivered its first shipment of sustainable aviation fuel (SAF) made partly from used cooking oil (UCO). Produced at the company's Cilacap refinery, around 32,000 liters of SAF were delivered to Pelita Air Services – Pertamina's airline subsidiary – for use on flights from Jakarta to Denpasar in Bali. Airlines using SAF from Pertamina would receive a Proof of Sustainability from ISCC CORSIA, proving that the entire supply chain had met sustainability standards and had been audited by international institutions. Pertamina's SAF products meet international standards ASTM D1655 and Def Stan 91-091, making them the first SAF product in Indonesia and Southeast Asia to be officially certified, the company said. KPI said it would also be delivering a 1.7M liters SAF shipment to Soekarno Hatta Airport, in Jakarta. Pertamina SAF has also been

made from refined, bleached, and deodorized palm kernel oil (RBD PKO) and palm kernel oil (PKO).

Period	1-31 Aug 2025				
	US Ethanol (Landed)	BR Anhyd. Ethanol (Landed)	BR Hyd. Ethanol (Landed)	MTBE (Landed Merak)	MOPS 92
Monthly Average, \$/bbl	86.81	98.96	90.16	80.68	77.96
Current vs Previous Month, %	+0.6%	+2.6%	+2.8%	-0.0%	-0.1%

*Ethanol FOB Houston plus MR freight (assume no premium & import tariff not included)

*MTBE FOB Singapore plus 5kt basis freight (assume no premium & import tariff not included)



Indonesia:

Regulation Update: Ministerial Regulation 04/2025

The Indonesian government's ethanol policy environment remains unsettled. Ministerial Regulation 04/2025 introduced an ethanol import ban under the rationale of supporting President Prabowo's push for food and energy self-sufficiency. While this stance reflects the administration's earlier nationalist tone, it has softened somewhat. In parallel, the Ministry of Trade (MOT) Regulation 16/2025 deregulates ethanol imports, listing biofuels—including ethanol—under the "Organic Chemical Industry sourced from Agriculture Products" category, which permits imports but subjects them to tariffs. This creates a potential regulatory misalignment between ESDM and MOT, with the Coordinating Ministry for Economic Affairs

(CMEA), which oversees U.S. trade negotiations, quietly signaling that ESDM should align and allow imports. However, no formal amendment to Regulation 04/2025 has been initiated.

In addition, A new Government Regulation 28/2025, issued as a Presidential Decree, stipulates that only companies with a commercial license may import ethanol.

Following on from Regulation 04/2025, ESDM is drafting a decree to outline the ethanol roadmap, including blend levels, rollout timelines, and geographic coverage. The current draft sets E5 blending for non-subsidized gasoline (RON 92 and above) in Java from January 2026 (~20% of national gasoline demand), expanding to E10 in Java and Bali by 2029.

USGBC has provided briefs to the U.S. government to highlight the ban of ethanol import as a non-tariff barrier in their ongoing negotiation with CMEA.

Pertamina Feedstock Diversification for Ethanol Production

PT Pertamina (Persero) is moving strategically toward renewable energy development by exploring the use of arenga palm (aren) as a feedstock for bioethanol. The company has launched pilot projects in North Sulawesi, supported by intensive feasibility studies to identify optimal locations. According to Vice President Director Oki Muraza, this initiative could become a game changer for Indonesia's energy transition, provided it aligns with national energy policy and subsidy strategies. Aren is recognized as a promising feedstock, thriving wild across Indonesia and capable of producing high-quality bioethanol from its sap, while offering significant social benefits at the village level. In Minahasa Selatan, Pertamina NRE's Project Director Norman Ginting indicated the focus is on assessing both the production volume and economic viability of converting aren sugar into bioethanol—highlighting that this effort is as much a social project as it is an energy project.

USGBC notes that while the aren-to-bioethanol initiative holds promise as a clean energy alternative, its scalability faces substantial hurdles. Large-scale production is constrained by the biology of the crop, with aren palms requiring 7–12 years to mature and often growing in scattered, non-plantation settings that complicate feedstock collection and logistics. Even if yields prove viable at pilot scale, the economics remain fragile: fuel-grade ethanol from aren is likely to be more costly than gasoline or molasses-based ethanol unless sustained subsidies or blending incentives are in place which conflicts with GOI's goal of reducing fuel subsidies. Environmental and land-use challenges also loom, as expansion could trigger forest conversion or social tensions if not carefully managed (there have been historic examples of failed rice/sugarcane programs in Merauke which resulted in deforestation and indigenous land right violation).

Malaysia:

Engagement with Ministry of Finance (MOF)

With the recent Sales and Service Tax (SST) taking into effect on July 1, 2025, the Council engaged the MOF on behalf of the Malaysian feed and livestock industry and US exporters to discuss the negative impacts of the SST. In lieu of this, the Council also took the opportunity to discuss the high import tariff and excise duties imposed on denatured ethanol. With regards to

ethanol, MOF noted that it is possible to provide an exemption on import tariff and excise tax on denatured ethanol, provided that an industrial need can be established (i.e., Petronas is supportive of ethanol blending) with no conflict from other relevant departments such as Customs. MOF's immediate concern on the exemption would be the misuse of denatured ethanol for alcoholic beverages. The Council explained that the denaturing process makes the ethanol toxic and unfit for human consumption and is done at the load port before leaving U.S.

Vietnam:

E10 Rollout Progress

E10 biofuel is planned to be sold nationwide from January 1, 2026, for use in petrol- powered motor vehicles nationwide, according to a draft circular of the Ministry of Industry and Trade (MoIT).

The MoIT is seeking public feedback on a draft circular which outlines the roadmap for blending biofuels with traditional fuels in Vietnam, first issued on July 29, 2025, with a revision done on August 15, 2025. The Circular sets out the roadmap for applying blending ratios of biofuels with conventional fuels in Vietnam. It defines the applicable subjects, blending schedules, and responsibilities for production, distribution, and use of biofuels (primarily ethanol and biodiesel).

The proposed timeline for the country's biofuels roadmap:

- From January 1, 2026: All gasoline for road and inland waterway vehicles nationwide must be E10.
- From January 1, 2031: All gasoline for road and inland waterway vehicles must be E15, or another biofuel blend ratio as determined by the Minister of MOIT based on economic, social, energy security, and vehicle development conditions.
- Biodiesel: Not yet mandatory, but organizations are encouraged to produce, blend, and use biodiesel fuels (B5, B10).

Innovation, Green Transition and Industrial Promotion Department (IGIP) under the Ministry of Industry and Trade (MoIT) will be submitting to the Minister of Industry & Trade a formal circular and proposal in mid-September 2025. It usually requires 45-60 days (sometimes with immediate effect) for the Minister to approve an official decree based upon this circular issuance. IGIP set up a "Drafting Committee for Biofuels Blending Circular" which USGBC has been invited to participate on. The committee had its first meeting on August 15, 2025.

The Vietnam National Petroleum Group (Petrolimex) and PetroVietnam Oil Corporation (PV Oil) has piloted the sales of E10 biofuel at its stations in areas of Ho Chi Minh City and Hanoi and Hai Phong starting August 1, 2025. The pilot rollout aims to assess consumer acceptance and the technical readiness of Petrolimex's and PV Oil's distribution network, serving as a foundation for nationwide expansion.

Central Vietnam Ethanol Plant Engagements

As Vietnam prepares to adopt nationwide E10 gasoline blending from January 1, 2026, the U.S. Grains & BioProducts Council traveled to central Vietnam to meet with ethanol producers and

assess industry readiness. These visits were part of ongoing efforts to support Vietnam's green energy transition and carbon neutrality targets.

The Council engaged with ethanol plants in Quang Ngai and Quang Nam provinces to better understand their current operations, production capacity, and feedstock use. Discussions focused on the challenges local producers face in scaling up supply, including technology limitations, feedstock availability, import competition, and the need for supportive policies. Producers highlighted both the opportunities and difficulties presented by the nationwide rollout of E10, from ensuring adequate ethanol supply to aligning infrastructure and regulatory frameworks.

These engagements provided valuable insights into how the Council can best assist Vietnam in its transition. The conversations reinforced Vietnam's ambition to expand biofuel adoption as a key component of its energy transition strategy while also underscoring the importance of coordinated action to ensure a smooth nationwide rollout.

“Developing Biofuels in a New Era” Forum in Hanoi

The U.S. Grains and BioProducts Council (USGBC) joined the Ministry of Industry and Trade's international forum on “Developing Biofuels in a New Era – Key Tasks to Build a Sustainable Fuel Future for Vietnam,” held in Hanoi on August 27, 2025. The event brought together government leaders, technical experts, and international partners to reaffirm Vietnam's commitments to renewable energy and outline next steps in its biofuels roadmap.

Vietnam has identified biofuels as a strategic tool to cut reliance on imported oil, improve energy security, and advance its net-zero by 2050 target. Pilot programs in major cities have received positive consumer response, and distributors are ready with blending and distribution infrastructure. Still, domestic production currently supplies less than half of expected demand, underscoring the need for expanded feedstock, higher production capacity, and supportive policy frameworks.

Forum discussions focused on the challenges and opportunities ahead, including developing technical standards, ensuring infrastructure readiness, and raising public awareness to build consumer acceptance. International cooperation and knowledge-sharing were highlighted as critical to strengthening Vietnam's role in the global biofuels supply chain. Looking forward, Vietnam aims to build on its E5 experience, transition to E10 in 2026, and explore higher blends such as E15 and E20 after 2030, with biofuels positioned as a central component of its long-term energy transition strategy.

Government of Vietnam Issues Directive on Potential SAF Mandate

The Ministry of Industry and Trade has issued a directive instructing ministries and agencies to develop policies supporting the national sustainable aviation fuel (SAF) market, including consideration of a potential mandate. The directive called for roadmaps covering production, imports, and distribution, alongside customs processes, technical and investment standards, and policy proposals.

Aviation fuel suppliers and airlines were directed to develop plans for research, production, and supply of SAF in line with national requirements. The Department of Trade Defense was tasked

with coordinating with the Ministry of Finance and other agencies to propose a mechanism for SAF, potentially modelled on the EU's ReFuelEU policy for international flights.

While no timeline or mandate level was specified, Vietnam has previously set a target to use 10% SAF in some short-haul flights by 2035 and transition to 100% SAF and green energy by 2050. Earlier this year, the state-owned Binh Son Refining and Petrochemical delivered its first imported SAF blend to Vietnam Air Petrol Company (Skypec), and Vietnam Airlines completed its first domestic flights using SAF.

As a member of the International Civil Aviation Organization, Vietnam will also be subject to the CORSIA scheme from 2027, requiring operators to offset emissions above 85% of 2019 levels through SAF use or carbon offsets. While many airlines are expected to rely initially on offsets, countries including Vietnam are exploring SAF mandates to stimulate domestic production and investment ahead of the scheme's full implementation.

Philippines:

Philippines Fuel Prices Climb to Year High

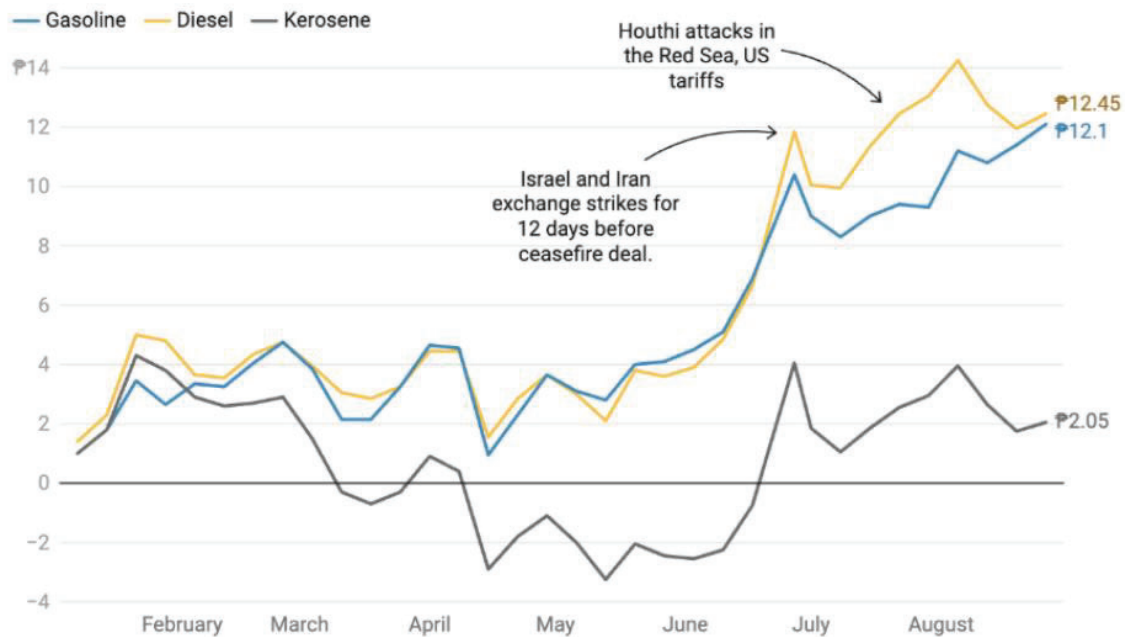
Oil companies implemented fuel price hikes on Tuesday, August 25, with gasoline up by P0.70 per liter, diesel by P0.50, and kerosene by P0.30. The adjustments were announced by Shell Pilipinas, CleanFuel, Seaoil, PetroGazz, and Caltex in separate advisories a day earlier.

The Department of Energy's Oil Industry Management Bureau (DOE-OIMB) noted that fuel prices are likely to continue rising in the coming months amid stronger demand. Ongoing tensions between Iran and Israel, along with the stalled U.S. attempt to broker a ceasefire between Russia and Ukraine, have also heightened global oil market volatility and supply concerns.

As of this latest adjustment, gasoline reached its highest price point of the year, up a net P12.10 per liter from end-2024 levels. Diesel rose by P12.45 per liter year-to-date, while kerosene increased by P2.05. The prior week saw mixed adjustments, with gasoline up by P0.60 per liter and diesel and kerosene down by P0.80 and P0.90, respectively.

Total net change of fuel prices in 2025

Here's a look at how gasoline, diesel and kerosene prices have changed since the beginning of 2025.



Oil firms announce price adjustments on a weekly basis. Each data point represents the cumulative sum of all price increases and decreases up to that week.

Chart: Philstar.com / Dominique Nicole Flores • Source: Department of Energy, Oil firms • Created with [Datawrapper](#)

Taiwan Regional Update

PROGRAM REPORTS

ATJ Technical Promotion Committee Holds Third Meeting to Advance Taiwan's SAF Strategy

On August 27, 2025, the ATJ (Alcohol-to-Jet) Technical Promotion Committee convened its third official meeting in Taipei, bringing together key stakeholders from government, industry, and academia to accelerate Taiwan's SAF development. The event focused on evaluating the domestic benefits of SAF production and charting a path toward commercialization.

The meeting featured a series of technical presentations, policy briefings, and panel discussions. Major agenda items included:

- **SAF Policy Landscape and Global Trends:** Experts shared insights into international SAF mandates and incentives, comparing Taiwan's readiness with global benchmarks.
- **Domestic SAF Production Feasibility:** A detailed benefit assessment was presented, analyzing the economic, environmental, and strategic advantages of producing SAF locally using ethanol-based feedstocks.
- **Technology Roadmap and Pilot Projects:** Industry leaders showcased ongoing R&D efforts and proposed pilot-scale demonstrations aimed at validating ATJ pathways under Taiwan's regulatory framework.
- **Carbon Reduction Potential:** Quantitative models were introduced to estimate lifecycle emissions reductions from SAF adoption, reinforcing its role in meeting Taiwan's 2050 net-zero goals.

The SAF benefit evaluation report revealed several compelling advantages of domestic production:

- **Economic Impact:** Local SAF manufacturing could reduce reliance on imported jet fuel, stimulate job creation, and enhance energy security.
- **Environmental Gains:** Lifecycle analysis suggests up to 80% reduction in CO₂ emissions compared to conventional aviation fuels.
- **Strategic Value:** Taiwan's existing ethanol production infrastructure and advanced chemical processing capabilities offer a competitive edge in scaling ATJ technologies.

The committee concluded with a consensus to intensify inter-agency coordination and support the investment in SAF. Future meetings will focus on regulatory alignment, feedstock sourcing strategies, and international partnerships. The ATJ Technical Promotion Committee continues to serve as a vital platform for shaping Taiwan's sustainable aviation future.

MARKET INFORMATION

- **Tigerair Taiwan:** Both newly delivered aircraft used ~5% SAF in ferry flights
- **Taoyuan International Airport Terminal 3:** Positioned as a low-carbon aviation hub with SAF.
- **China Airlines & EVA Air:** Signed agreements with Formosa Petrochemical to use 2% SAF from 2025, rising to 5% by 2030.

- STARLUX Airlines: Will apply 2% SAF on all flights starting 2027, rising to 5% by 2035.
- Formosa Plastics: Announced expansion into renewable fuels, showcasing a new “carbon- eating tool” and shift from petrochemicals to green energy & SAF-related ventures

Japan Regional Update

PROGRAM REPORTS

The Council deepens the relationship with Diet member Mr. Iwata on ethanol introduction in Japan

The Council met with Diet member Mr. Kazuchika Iwata on August 28, 2025 to exchange views on the use of bioethanol, its role in sustaining rural gas stations, and challenges around continued imports of U.S.-produced bioethanol. Mr. Iwata did not previously have detailed knowledge of bioethanol. He understood that in an environment like Japan, where auto policy cannot be entirely focused on EVs, bioethanol is one of the existing technologies that can be utilized for carbon reduction. He showed interest in the issues related to sustaining rural gas stations and shared the same concept of the challenges ahead. The Council will keep providing updates to Mr. Iwata's office on an ongoing basis.

The Council organized a technical information exchange workshop between the U.S. and Japanese experts on ethanol direct blending in Japan

The Council held a technical ethanol workshop to speak about the roadmap and challenges of introducing of gasoline blended with 10 and 20 percent ethanol (E10 and E20) in Japan on August 5. METI recently announced its plan to introduce E10 in limited areas in 2028 followed by full nationwide E10 implementation in 2030, as well as establishing an E20 program by 2040. For smooth introduction of direct blending, the Council hosted the venue to provide U.S. experiences in direct blending introduction. USGBC Ethanol Consultant Rowena Torres-Ordonez and representatives from Council members Growth Energy and the Renewable Fuels Association traveled to Tokyo for the event, beginning with meetings with METI and the Japanese Meteorology Research Institute (MRI) to discuss the financial and environmental benefits of biofuels. Discussion topics at the workshop, attended by nearly 60 people, included an overview of supply infrastructure and fuel procurement procedures, as well as fuel quality and vehicle standards for biofuel integration. It is important to share the experience with the Japanese stakeholders, positioning U.S. producers at the forefront of Japanese importers and end-users' minds, are of paramount importance to secure future market share.

Preparation going on for public symposium on December 4, 2025

KREAB, a consulting firm on ethanol promotion, and the Council are discussing on the details of a public targeted symposium to be held on December 4, 2025. The symposium hosted by Nihon Keizai Shimbun (Nikkei) and sponsored by the Council will feature a panel discussion between the U.S. and Japanese academia, government and industry stakeholders. As Nikkei organizes the symposium, there will be a cover story on the symposium in the nationwide economy-oriented newspaper.

MARKET INFORMATION

Japan's ethanol imports in July 2025 (gallon)

Import of Ethanol in Japan						
Jul-25						
(Unit: gallon)						
	Total import	Total import	Import from US	Import from US	US Market Share	HS Code
	Jul-25	Jan. to Jul. 2025	Jul-25	Jan. to Jul. 2025	(%)	
<i>Industrial</i>						220710
Industrial	10,556,053	55,924,210	0	0	0.0%	220710121
For EtAc	581,339	5,417,240	0	0	0.0%	220710122
For EtAm	210,440	2,132,173	0	0	0.0%	220710123
Other	2,850,346	14,472,824	1,068,479	4,776,400	33.0%	220710199
Denatured	0	1,331	0	0	0.0%	220720100
Industrial Total	14,198,178	77,947,778	1,068,479	4,776,400	6.1%	
<i>Fuel</i>						
	0	4,969,642	0	4,969,642	100.0%	220710191
<i>Excl Beverage Total:</i>	14,198,178	82,917,420	1,068,479	9,746,043	11.8%	
<i>Beverage</i>	5,931,233	36,420,967	2,486,942	6,040,413	16.6%	220710130
<i>Incl Beverage Total:</i>	20,129,411	119,338,388	3,555,421	15,786,456	13%	
<i>ETBE</i>	46,848,120	298,092,432	46,848,120	298,092,432	100.0%	290919010
As Ethanol Equivalent	19,849,548	126,301,763	19,849,548	126,301,763	100.0%	
Fuel Total (As Ethanol):	19,849,548	131,271,406	19,849,548	131,271,406		

Korea Regional Update

PROGRAM REPORTS

Participated APEC 16th Clean Energy Ministerial (CEM16)

Korea Director participated in the 16th Clean Energy Ministerial (CEM16), held in Busan, South Korea, from August 25 to 27, 2025. It was an opportunity to strategically collaborate on clean energy solutions, share knowledge, and engage with policymakers, industry leaders, and key stakeholders from across the Asia-Pacific region.

At the meeting, the United States announced its commitment and leadership to establish the CEM Initiative to increase access to modern, clean cooking using ethanol.

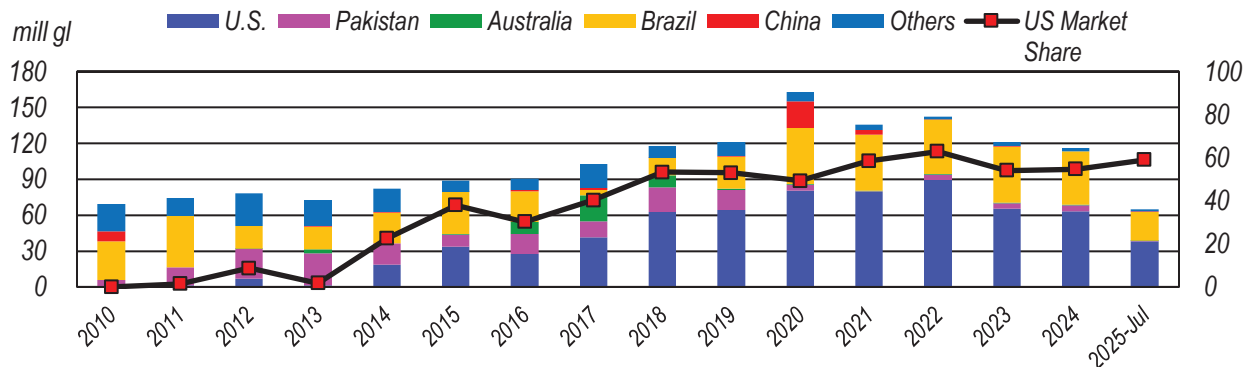
At CEM16, in line with the CEM Sustainable Lifestyles Campaign, declarations on sustainable lifestyles and equity were issued, solidifying the shared commitment that sustainable lifestyles and individual climate action are key drivers for the transition to clean energy. CEM16 also presented ways for leaders from various ministries and regulatory agencies to come together and support the acceleration of decarbonization.

MARKET INFORMATION

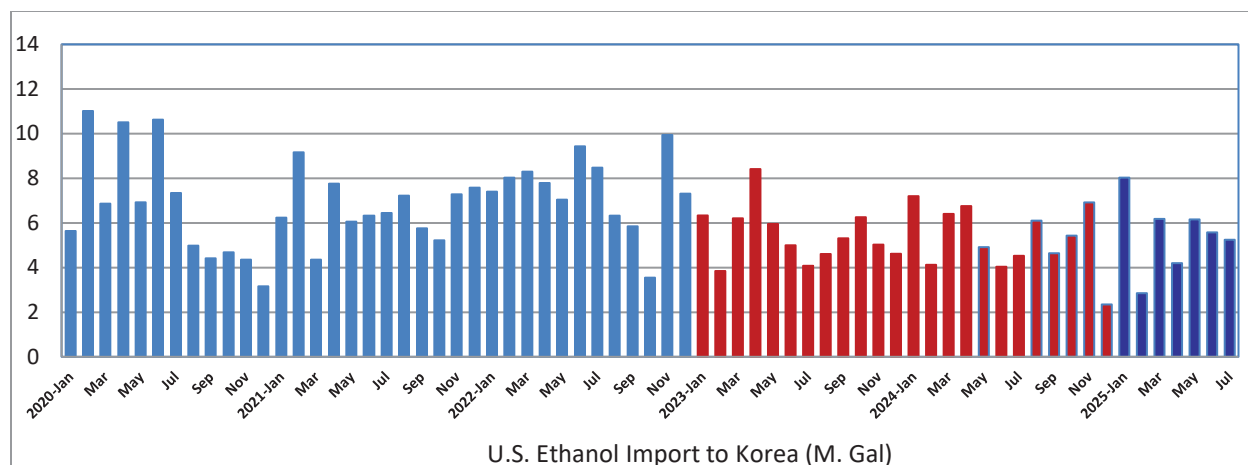
U.S. ethanol imported in Jan-Jul up 0.7% year-on-year to 38.2 million gallons

South Korea's total ethanol imports were 64.7 million gallons from January to July, down 4.9 percent from the same period in 2024. Of the total ethanol imports, 36.3 million gallons, 56.1 percent, were used for industrial purposes, and 28.4 million gallons, 43.9 percent, were used for beverage alcohol. Meanwhile, U.S. ethanol imports amounted to 38.2 million gallons, accounting for 59.0 percent, up 0.7 percent from the previous year. Most of the ethanol imported from the United States is consumed for industrial use. And Brazilian ethanol was imported at 23.6 million gallons, down 5.4 percent from the previous year. 1.1 million gallons were imported from South Africa and 1.8 million gallons from other countries. These import statistics do not include the volume of transshipment exports of U.S. ethanol through the bonded area of Ulsan Port.

U.S. Ethanol Imports, 2010 – July 2025



Monthly U.S. Ethanol Imports, 2020 – July 2025



MOTIE and MOLIT jointly announced a roadmap for mandatory SAF blending on September 19

On September 19th, the Ministry of Trade, Industry and Energy (MOTIE) and the Ministry of Land, Infrastructure and Transport (MOLIT) jointly announced the "Sustainable Aviation Fuel (SAF) Blending Mandatory Roadmap," with representatives from the oil refining and aviation industries and related organizations in attendance. They also decided to officially launch the "SAF Alliance."

The government announced a "SAF Expansion Strategy" in August of last year, and nine domestic airlines currently operate some short-haul routes using a 1% domestic SAF blend.

This year, the government went a step further and, through a task force meeting involving the MOLIT, the MOTIE, the aviation and oil refining industries, relevant organizations, and experts, developed a "SAF Blending Mandatory System Roadmap," which includes the annual mandatory SAF blending ratio and comprehensive support measures.

According to this, the mandatory SAF blending ratio will be set at 1% starting in 2027, increasing to 3-5% in 2030, and 7-10% in 2035. All international flights departing from domestic airports must refuel at least 90% of their annual fuel volume (SAF blended aviation fuel) at the departure airport.

New airlines will be exempt from the blending obligation for three years, and non-compliance fines will be deferred for one year. MOLIT is considering granting national airlines that fuel with SAF blended fuel exceeding the blending requirement a bonus of 3.5 points toward international air traffic rights allocation and reducing existing airport facility usage fees for international flights fueled with SAF. Furthermore, airlines will offer lounge access and preferred seating to passengers who voluntarily pay SAF contributions. MOTIE also plans to consider incentives for next-generation SAF production technology and support for new SAF investments and pursue tariff concessions for biofuel ingredients for SAF.

To this end, the government will continue to support R&D and facility investment tax credits for bio-based SAF, designated as a national strategic technology, and will consider additional incentives.

September 2025 Monthly Management Report

Middle East, Africa & Europe Regional Update

MARKET INFORMATION

Ethanol Exports:

With the Fed Government shutdown, there will be no GATS number updates or Ethanol Export Sales Reports this month from USDA.

U.S. Ethanol exports to Europe – January to July 2025 – in liters.

	Ethanol
Belgium	64,000
Bulgaria	10,080
Cyprus	44,760,400
Denmark	
Finland	
France	25,019,000
Germany	24,200
Greece	9,400
Netherlands	607,984,500
Norway	12,033,100
Iceland	72,700
Ireland	14,200
Italy	247,200
Lithuania	6,000
Poland	
Portugal	4,200
Romania	
Spain	6,335,700
Sweden	13,263,100
Switzerland	17,794,200
UK	478,504,300
Turkey	2,579,700
Misc.	
Total	1,208,726,720

USDA GATS August 2025

Europe:

UK

The UK Renewable Transport Fuel Association has slammed proposed anti-dumping duties on Chinese biodiesel put forth by the national trade defense body, arguing that they were set too low to protect local producers.

According to the RTFA, the UK Trade Remedies Authority made a "fundamental error" in selecting the domestic used cooking oil price in Malaysia to calculate the duties, on the basis that Malaysian prices recorded by trade statistics were unreliable.

In fact, the proposed anti-dumping duties are underestimated as certain factors are severely distorted...for every Chinese exporter, the proposed anti-dumping duties are materially insufficient.

The predictable consequences are further plant closures, mothballing of capacity, and accelerating profit margin erosion.

EU

ePURE has submitted its reply to the EU public consultation on the CO₂ emissions standards for cars and vans regulation. According to ePure, their priorities in the response were:

1. The CO₂ review for cars and vans should respect technology neutrality and recognise all alternatives based on GHG emission reduction
2. The use of sustainable renewable fuel complements the electrification of road transport
3. Defining CO₂ neutral fuels in a robust and comprehensive framework
4. Incorporating a Life-Cycle Analysis and a Carbon Correction Factor in the CO₂ emission standards review
5. Create a Low Emission Vehicles class recognition for vehicles running exclusively on CO₂ neutral fuels
6. Ensure EU competitiveness, consumer choice, energy security and reduce crude oil imports

Denmark

The Danish government has picked Oslo-based airline Norwegian as winner of subsidies to use sustainable aviation fuel (SAF) on Denmark's first green domestic route (Argus).

Norwegian will fly with at least 40% SAF nearly all journeys of the busiest domestic route in Denmark, between Aalborg and Copenhagen,

Middle East:

UAE

The UAE state-owned renewable energy company, Masdar, has signed a strategic collaboration agreement with the developer and operator of the UAE's national railway network to explore the development of green hydrogen use for transport solutions.

Masdar and railway operator will study opportunities to enable the transportation of feedstocks and products in the green hydrogen value chain including sustainable aviation fuel, ammonia and methanol.

The UAE has submitted the third edition of its action plan to reduce emissions in its aviation sector to the International Civil Aviation Organization during the 42nd ICAO Assembly, which includes several sustainable aviation fuel projects, according to state media.

The updated plan adopts a comprehensive "basket of measures" which includes 13 projects related to sustainable aviation fuel and low-carbon fuels and 42 projects in operations and technology, reported the Emirates News Agency.

Oman

The Port of Salalah has entered into a lease agreement with Horizon Energy Salalah to construct a biofuel storage hub, positioning Oman to boost exports, according to local media reports.

Salalah Port will play a pivotal role as the gateway for green molecule exports and the project would enhance Oman's role in the east-west shipping route and support Oman Vision 2040 goals, which call for diversification of economies and energy.

Mexico Regional Update

PROGRAMS REPORTS

National Meeting on Biofuels and their Blends, Tamaulipas

Galo Galeana and Estefania Perez travelled to Tampico Tamaulipas to participate in the National meeting on Biofuels and their blends, this event is organized by the State Energy Commission to discuss Mexico's energy transition and the future of renewable fuels. Following the MOU signed between the U.S. Grains & Bioproducts Council (USGBC) and the State of Tamaulipas in May 2025, our participation reinforced collaboration with state authorities and provided firsthand access to policy and project developments.

During the event, the USGBC took part in a roundtable on liquid biofuels alongside CONADESUCA, ASA, and IMP, addressing technology, infrastructure, and production challenges. The Secretary of Energy Development, Walter Ángel Jiménez, formally requested USGBC's support under the MOU to develop an ethanol-from-sorghum program. The conference strengthened ties with federal and state government leaders and industry stakeholders committed to advancing biofuel blending initiatives in Mexico.

MARKET INFORMATION

Tamaulipas strengthens its energy leadership at international USA–Canada meeting

The Undersecretary of Investment, Strategic Projects, and Sustainable Development of the Secretary of Energy and Development (SEDENER) of Tamaulipas, Óscar Xitec Pérez Contreras, participated in the U.S.-Canada Trade Mission meeting, which brought together more than 100 companies from strategic sectors to consolidate Tamaulipas as an attractive investment and trade destination in North America. Representing Secretary Walter Julián Ángel Jiménez, Contreras emphasized that Tamaulipas maintains its energy leadership with projects that include promoting sustainable biofuels.

Green Cuauhtémoc, recycling cooking oil

The Cuauhtémoc municipality became the first in Mexico City to implement a program to collect used cooking oil in public markets, within the "Cuauhtémoc Verde" (Green Cuauhtémoc) axis. The project began at the Martínez de la Torre Market with 35 collection points. The collected oil, instead of polluting water and damaging drainage, will be used as raw material to produce biofuels, boosting the circular economy. Mayor Alessandra Rojo de la Vega emphasized that one liter of oil can pollute up to 40,000 liters of water and highlighted that this action demonstrates the possibility of transforming waste into wealth and environmental benefits.

Sugarcane industry crisis

The sugarcane industry is facing a crisis due to a 25% drop in cane prices, excess production, and the replacement of sugar with alternative sweeteners. Luis Ramiro García Chávez, representative of the National Committee for the Sustainable Development of Sugarcane, pointed out that more than 185,000 producers depend on this activity. In response, he is promoting the use of sugarcane and sorghum biomass to produce ethanol, a sustainable energy alternative that has already been tested in Mexico and is part of the Mexico Plan for cleaner fuels.

Southeast Asia & Oceania Regional Update

RAPP UPDATE

- Southeast Asia Commercial & Technical Trade Team Engagements – ongoing
- Coarse Grain for High-Value Food Promotion – ongoing
- Widening Stakeholder Engagement & Global Event Influence – ongoing
- Indonesia E7 Promotion, Implementation, & Nationwide Development – ongoing
- Viet Nam Nationwide Scaling to E10 Adoption – ongoing
- Philippines E20 Commercial Implementation & Mandate Creation – ongoing
- SE Asia Emerging & Frontier Market Development & Engagement – ongoing

PROGRAM REPORTS

USGBC Attends APPEC 2025 Conference in Singapore

The Council attend the The Asia Pacific Petroleum Conference (APPEC) 2025 Conference in Singapore and for networking and staying informed on key industry trends for the region. APPEC, held from September 8–11, 2025, brought together global and regional energy stakeholders to discuss oil market dynamics, refining trends, and the accelerating energy transition in Asia Pacific. For the first time, the event introduced a dedicated biofuels conference, highlighting growing regulatory and commercial focus on low-carbon fuels. Participation by USGBC regional ethanol consultants provided valuable engagement opportunities with policymakers, traders, and producers, offering insight into evolving regional biofuel blending mandates, trade barriers, and sustainability frameworks. These interactions are expected to inform future market development strategies and enhance collaboration with stakeholders across the downstream and renewable fuel value chains.

Discussions at APPEC pointed to a continuing crude supply overhang through 2025, with refining margins expected to moderate as new capacity comes online in 2026. Ethanol remained central to global biofuels demand, even as renewable diesel and sustainable aviation fuel (SAF) gained traction. Policymakers and industry representatives noted a shift in the expected peak for ethanol and biodiesel demand to the early 2030s, underpinned by supportive mandates and resilient gasoline pools. In Southeast Asia, ethanol blending remains uneven, with most growth concentrated in Thailand, the Philippines, and Vietnam. PETRONAS highlighted progress at its Pengerang Biorefinery and SAF blending initiatives as examples of regional diversification. Across all sessions, a key theme was the growing intersection between ethanol and SAF feedstock needs, reinforcing the importance of coordinated policy design to balance energy security, cost stability, and sustainability goals.

Council Attends Sugar & Ethanol 2025 Conference in Bangkok

Sugar & Ethanol Conference 2025 provides an opportunity for markets around the world to present industry updates and discuss challenges. The conference highlighted the growing strategic importance of ethanol across Asia and Latin America, showcasing diverse national approaches to renewable energy and bio-based industries. Brazil underscored its leadership in sugarcane-based bioeconomy and innovation in ethanol-to-bioplastics, reinforcing its role as a global model for sustainable production. India presented ethanol as a cornerstone of its energy

transition, with strong government backing for its E20 blending mandate and expansion of second-generation ethanol projects. Pakistan's outlook remained steady but constrained by feedstock volatility and climate-related risks, maintaining its position as a moderate but inconsistent supplier. In Southeast Asia, Indonesia's new blending policy marks an important step toward ethanol integration in transport fuels, though industrial capacity remains a key bottleneck.

Thailand emerged as the region's most advanced ethanol producer, leveraging diversified feedstocks and established blending mandates while positioning itself as a future hub for sustainable aviation fuel (SAF) and biobased industries. Strong domestic demand, SAF development, and biorefinery investments are expected to limit Thailand's near-term ethanol export capacity, though opportunities may re-emerge as production efficiency improves. Across the region, fuel use continues to dominate ethanol demand—accounting for roughly three-quarters of total consumption—driven by transport blending programs in India, Thailand, and Indonesia. Industrial applications, including bioplastics pharmaceuticals, and SAF, are expanding rapidly, signaling a broader shift toward higher-value, low-carbon uses for ethanol beyond road transport.

MARKET INFORMATION

Oil Market Update

In September 2025, the average price of Brent crude oil was \$68.02 per barrel, relatively unchanged from \$68.21 per barrel in August 2025.

Global oil markets in September 2025 were shaped by OPEC+ decisions and ongoing supply-demand dynamics. The group, led by Saudi Arabia, continued unwinding its earlier production cuts, adding 137,000 bpd in October and considering a much larger increase for November, potentially up to 500,000 bpd. While Saudi Arabia pushed for higher output to regain market share, Russia resisted due to sanctions and seasonal demand concerns. Oil prices remained volatile, with Brent trading around \$69 per barrel and WTI near \$65, supported by an unexpected U.S. inventory draw and concerns over Ukraine's intensified drone strikes on Russian energy infrastructure.

India emerged as a key player in September's oil trade flows. With expanded refining capacity and increased ethanol blending in domestic gasoline, Indian refiners boosted both gasoline and diesel exports to multi-year highs. Gasoline exports reached nearly 400,000 bpd, while diesel shipments were projected at up to 630,000 bpd, much of it bound for Europe to cover winter heating demand amid refinery maintenance elsewhere. This shift has positioned India as a vital supplier, especially as Europe phases out imports of Russian-derived petroleum products under its latest sanctions.

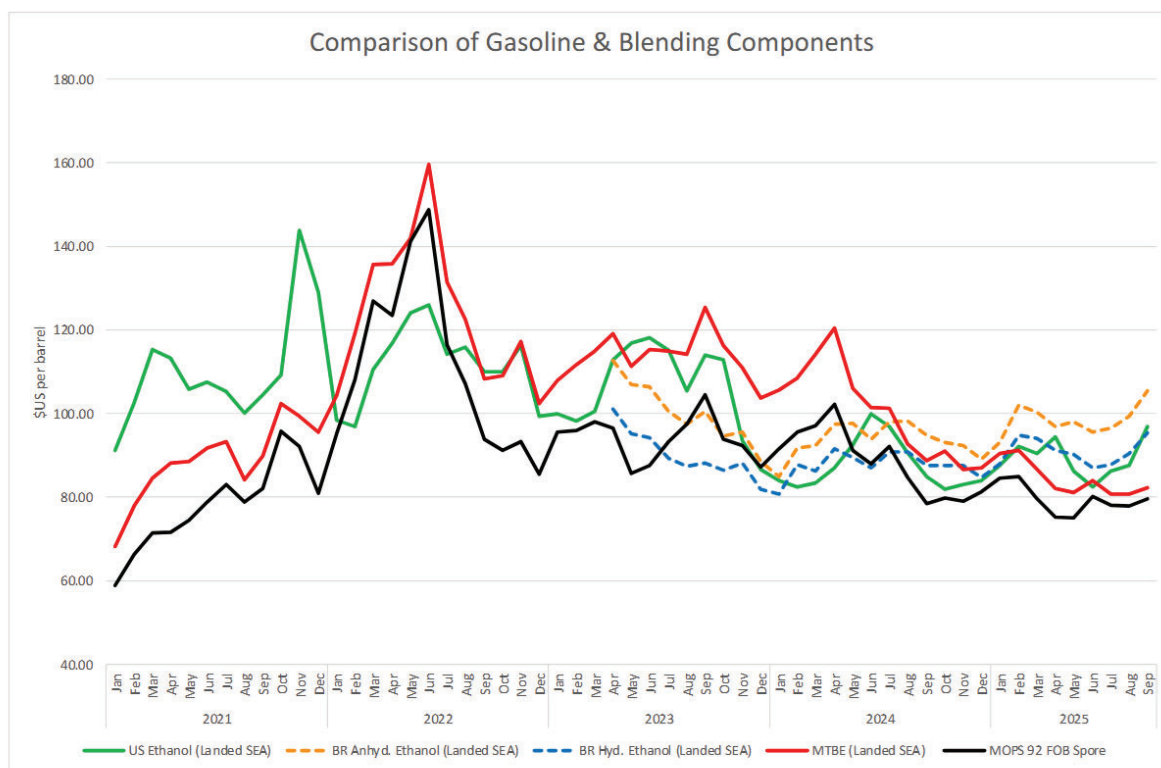
On the U.S. side, exports of West Texas Intermediate (WTI) crude to Asia surged, led by buyers in South Korea and India, as well as first-time purchases by Pakistan and Vietnam in 2025. However, the arbitrage window narrowed due to sharply higher freight rates for Very Large Crude Carriers (VLCCs), with shipping costs peaking at \$12.5 million per voyage. Despite these logistical pressures, Asian appetite for U.S. crude remained strong. Looking ahead, HSBC

projected a growing oil surplus, estimating 1.7 million bpd in Q4 2025 and 2.4 million bpd in 2026, raising the risk of downward pressure on Brent prices should stock builds materialize in Western markets.

Period	1-30 Sep 2025				
	US Anhyd. Ethanol (Landed)	BR Anhyd. Ethanol (Landed)	BR Hyd. Ethanol (Landed)	MTBE (Landed Merak)	MOPS 92
Monthly Average, \$/bbl	96.94	105.49	95.28	82.27	79.52
Current vs Previous Month, %	+10.7%	+6.2%	+5.4%	+2.0%	+2.0%

*Ethanol FOB Houston plus MR freight (assume no premium & import tariff not included)

*MTBE FOB Singapore plus 5kt basis freight (assume no premium & import tariff not included)



Indonesia:

Update on Pertamina's Ongoing Tender Reforms

In mid-2025, Pertamina revised its gasoline tender policy by broadening sourcing rules while excluding Singapore from two of its second-half import tenders. This move was framed as part of a strategy to diversify supply, though civil society watchdogs, including CERI, alleged that cartel-like dynamics still influence Pertamina's tender process. They claimed that vendors previously blacklisted by prosecutors were re-invited to participate, raising concerns about transparency and accountability in the company's procurement practices. These developments occurred against the backdrop of an ongoing corruption investigation into Pertamina's crude and fuel import operations, which has further eroded trust in the state energy firm's governance.

By late September, Pertamina Patra Niaga procured roughly 16,000 kilolitres (100,640 barrels) of gasoline and offered it to private retailers such as Shell, BP-AKR, and Vivo to help alleviate tightening supply. Vivo initially agreed to purchase 40,000 barrels, with quality and quantity tests scheduled to follow. However, the deal soon collapsed over specification concerns, particularly the fuel's 3.5% ethanol content, which Vivo cited as the reason for withdrawal. BP-AKR also refused to proceed due to the absence of a certificate of origin and trade-compliance risks, underscoring heightened scrutiny in the wake of Pertamina's corruption scandal.

By early October, Pertamina acknowledged that private retailers had yet to purchase any of its imported fuel despite dwindling inventories. Shell, BP-AKR, and Vivo all warned that their gasoline stocks would last only a few days, with BP-AKR signaling it may reassess expansion plans due to persistent supply risks. The dispute highlights a widening trust deficit between Pertamina and private operators, where quality assurance, certification, and governance issues weigh heavily on commercial decisions. Combined with corruption allegations and ongoing procurement controversies, these challenges amplify both operational and reputational risks for Indonesia's downstream fuel market.

Regulation Update: Ministerial Regulation KEMENDAG 04/2025 (MEMR) and PERMENDAG 32/2025 (Ministry of Trade)

APSENDU, the Indonesia Association of Ethanol Producers, reported that Indonesia's Ministry of Trade issued Regulation No. 32/2025, reversing the earlier deregulation of ethanol and cassava derivative imports set under Permendag 16/2025. Ethanol, previously import-free, will now require import approval from the relevant ministry, with fuel-grade ethanol falling under the Ministry of Energy and Mineral Resources. The regulatory shift aims to stabilize molasses prices, protect sugarcane farmers, and support national sugar and energy self-sufficiency goals. The reversal followed strong opposition from the Indonesian Sugarcane Farmers Association (APTRI) and APSENDU, which argued that unrestricted ethanol imports could harm local producers. While USGBC had previously engaged APSENDU to differentiate between industrial and fuel-grade ethanol concerns, the urgency of the change led to a blanket restriction covering all denatured ethanol. The decision was also influenced by farmer-led demonstrations in Jakarta, prompted by declining molasses prices—currently around IDR 1,000/kg compared to an average of IDR 3,000/kg in 2024. According to APSENDU, Indonesia's 2024 industrial ethanol production reached 41.3 million gallons, with 2.8 million gallons imported (mainly from Pakistan under an FTA), 11.3 million gallons exported, and domestic demand estimated at 31.3 million gallons. Meanwhile, under MEMR Regulation No. 4/2025, which currently bans fuel ethanol imports, the ministry is expected to transition to a quota-based system tied to surplus demand once local supply is fully utilized. The updated ethanol blending roadmap and quota mechanism are anticipated to be finalized before the end of 2025.

Taiwan Regional Update

PROGRAM REPORTS

USDA Agricultural Trade Mission to Taiwan

Against the backdrop of rising global energy challenges and the drive toward carbon neutrality, the United States and Taiwan came together to chart a new course for clean energy cooperation. Through a series of high-level meetings and public engagements, the U.S. Department of Agriculture (USDA), American Institute in Taiwan (AIT), and the U.S. Grains and BioProducts Council (USGBC) joined forces with Taiwan's government agencies and research institutions to promote bioethanol as a cornerstone of Taiwan's energy resilience and low-carbon transition.

The ethanol activities in Taiwan were part of the USDA Agribusiness Trade Mission (ATM) to Taiwan, coordinated by the Foreign Agricultural Service (FAS), Global Programs (GP), and Trade Missions and Shows (TMS) divisions. These trade missions are designed to help U.S. agricultural producers access new or expand existing international markets by establishing partnerships in agri-food production, processing, inputs, and value-added products.

As part of this mission, the U.S. Grains & BioProducts Council organized a dedicated delegation, which visited the Taiwan Science and Technology Office for Net-zero Emission (T-STONE) under the National Science and Technology Council to engage in policy discussions on international and domestic carbon reduction strategies, as well as the promotion of ethanol applications in Taiwan. They also participated in the Ethanol Gasoline Promotion Committee meeting, organized by USGBC, and attended the U.S.–Taiwan Energy Resilience Forum, co-hosted by AIT and USGBC. These engagements provided valuable insights into the progress, trends, and future directions of Taiwan's ethanol policy and its role in advancing clean energy transformation.

The highlight of the events was the U.S.–Taiwan Energy Resilience Forum, which attracted senior government officials, industry leaders, and academic experts. The forum underscored ethanol's growing role in enhancing Taiwan's energy security, reducing greenhouse gas emissions, and supporting the nation's 2050 net-zero ambitions. In his keynote address, Luke Lindberg, USDA Under Secretary for Trade and Foreign Agricultural Affairs, emphasized that adopting E10 gasoline could significantly strengthen Taiwan's energy independence while cutting carbon emissions and saving an estimated NT\$10 billion annually in fuel costs. "Our cooperation in renewable fuels reflects not just shared economic interests but a shared vision for a cleaner, more resilient future," Lindberg said, moments after test-riding an E10-compatible motorcycle at the event to demonstrate ethanol's practicality. Karin Lang, AIT Acting Director, echoed the sentiment, highlighting the U.S. commitment to being Taiwan's most reliable energy partner. "Energy resilience depends on diverse, flexible, and affordable solutions. Ethanol is one of them, and the United States stands ready to help Taiwan achieve that vision," she said. Ryan LeGrand, USGBC President and CEO, noted that Taiwan's ethanol market is poised for growth. "E10 and sustainable aviation fuel (SAF) are gaining policy attention. U.S. ethanol provides a cost-effective, low-carbon solution that can help Taiwan advance both its decarbonization and energy security goals," he said.

Beyond the forum, the USDA delegation, USGBC representatives, and their Taiwanese counterparts explored future cooperation in biofuel innovation, synthetic aviation fuel applications, and circular economy development, laying a foundation for sustained collaboration in clean energy technology.

The initiative also drew extensive media attention, with 57 news stories across print, television, online, and social media highlighting the events. Headlines emphasized U.S.–Taiwan cooperation in bioethanol, energy resilience, and sustainability, which reflect growing public interest in Taiwan’s clean energy transition.

As the hum of an E10 motorcycle echoed through the forum venue, it represented more than just technical demonstration and symbolized the progress. The U.S.–Taiwan ethanol partnership is accelerating, driving both economies toward a cleaner, more resilient, and sustainable future.

MARKET INFORMATION

- The 2025 Asia-Pacific Sustainability Expo opened at the Taipei World Trade Center. EVA Air, the only participating airline, showcased its decarbonization initiatives under the theme “Green Skies, Together We Fly,” including AeroSHARK biomimetic film technology, Sustainable Aviation Fuel (SAF) adoption, and eco-friendly in-flight products.
- China Airlines and TSMC deepened their cooperation, launching a Corporate Business Travel SAF Carbon Reduction Program using domestically produced Sustainable Aviation Fuel (SAF). This supports both companies’ net-zero goals and strengthens air logistics between Taiwan and U.S. destinations such as Los Angeles, San Francisco, Phoenix, and Kumamoto.
- Vice Premier Cheng instructed six ministries to accelerate large-scale emission reductions through regulatory breakthroughs, including faster energy transition from coal to gas and promotion of near-zero-carbon buildings.
- Environmental NGOs urged stronger 2030–2035 targets, arguing that Taiwan’s planned 36–40% GHG reduction by 2035 should be 52% to meet net-zero pathways.
- Taiwan’s Environmental Impact Assessment Act will be amended to make carbon reduction a mandatory evaluation criterion in all development projects.
- August electric scooter sales were 4,231 units, down 17.6% from July. Market shares: Sanyang 46.1%, Kymco 25.3%, Yamaha 17%, Gogoro 4%.
- Sanyang Motor installs 1,100 kW of solar capacity and implements smart energy management systems, continuing its emissions-reduction investments.

Japan Regional Update

PROGRAM REPORTS

Bioethanol Supply Conference invited Nebraska governor, Illinois and Iowa Corn, with B2B meetings between four ethanol stakeholders and the Japanese industry

The Council hosted 2025 U.S. Bioethanol Supply Conference on September 8, 2025, in Tokyo. The event began with opening remarks by the Deputy Chief of Mission at the U.S. Embassy in Tokyo, followed by presentations from the Governor of Nebraska Jim Pillen followed by Nebraska Corn, Illinois Corn and Iowa Corn presentations on corn and ethanol current and future supplies in respective states. Approximately 80 Japanese buyers and related parties attended. The conference served as a key opportunity for the U.S. ethanol industry to network and establish business contacts with Japanese customers. The Council also arranged B2B meetings for interested U.S. bioethanol suppliers with potential Japanese customers on September 9.

The Council celebrated the fourth E7 station to open by Nakagawa Bussan

Nakagawa Bussan invited the Council to an appreciation reception celebrating the opening of a new E7 station in Takayama, Gifu Prefecture on September 18. Nakagawa Bussan is a local gasoline blender and retailer, known for being the only retailer selling E3 gasoline since 2011, and selling 0.2 million liters of E3 gasoline in 2020. Around 100 customers and business partners attended the ceremony and reception, and the Council was introduced to several attendees. The new E7 station is scheduled to open in November 2025.

MARKET INFORMATION

Japan imported 5 million gallons of U.S. ethanol to convert to ETBE in Japan for gasoline blending so far this year

Japan had been importing solely Brazilian ethanol to convert to ETBE in Japan until February 2025 even though U.S. ethanol gained market access to this market since 2018. Japan imported 2.6 million gallons and 2.4 million gallons of ethanol for fuel (ETBE) in March and June 2025, respectively (please see the ethanol import table below). Japan uses 218 million gallons of ethanol blended in gasoline as ETBE annually. Therefore, the volume of ethanol converted to ETBE in Japan is only about 2.3% while the rest is imported as ETBE. JBSL, the ethanol importing window organization for the petroleum industry, had explained to the Council the reason for importing only Brazilian ethanol as the specification difference between U.S. and Brazilian ethanol. However, JBSL responded to the Council's question for this reason simply as the price advantage. The Council expects Japan will keep buying U.S. ethanol as the price advantage continues as long as the total weighted average of carbon reduction keeps higher than Japan's requirement of 60%.with

Japan's ethanol imports in August 2025 (gallon)

Import of Ethanol in Japan						
Aug-25						
(Unit: gallon)						
	Total import	Total import	Import from US	Import from US	US Market Share	HS Code
	Aug-25	Jan. to Aug. 2025	Aug-25	Jan. to Aug. 2025	(%)	
Industrial						220710
Industrial	2,837,703	58,761,913	0	0	0.0%	220710121
For EtAc	1,011,634	6,428,874	0	0	0.0%	220710122
For EtAm	373,451	2,505,624	0	0	0.0%	220710123
Other	2,201,405	16,674,229	417,689	5,194,089	31.2%	220710199
Denatured	0	1,331	0	0	0.0%	220720100
Industrial Total	6,424,192	84,371,970	417,689	5,194,089	6.2%	
Fuel						
	0	4,969,642	0	4,969,642	100.0%	220710191
Excl Beverage Total:	6,424,192	89,341,613	417,689	10,163,732	11.4%	
Beverage	3,785,352	40,206,319	1,287,800	7,328,213	18.2%	220710130
Incl Beverage Total:	10,209,544	129,547,932	1,705,489	17,491,945	14%	
ETBE	42,076,848	340,169,280	42,076,848	340,169,280	100.0%	290919010
As Ethanol Equivalent	17,827,960	144,129,724	17,827,960	144,129,724	100.0%	
Fuel Total (As Ethanol):	17,827,960	149,099,366	17,827,960	149,099,366		

South Korea Regional Update

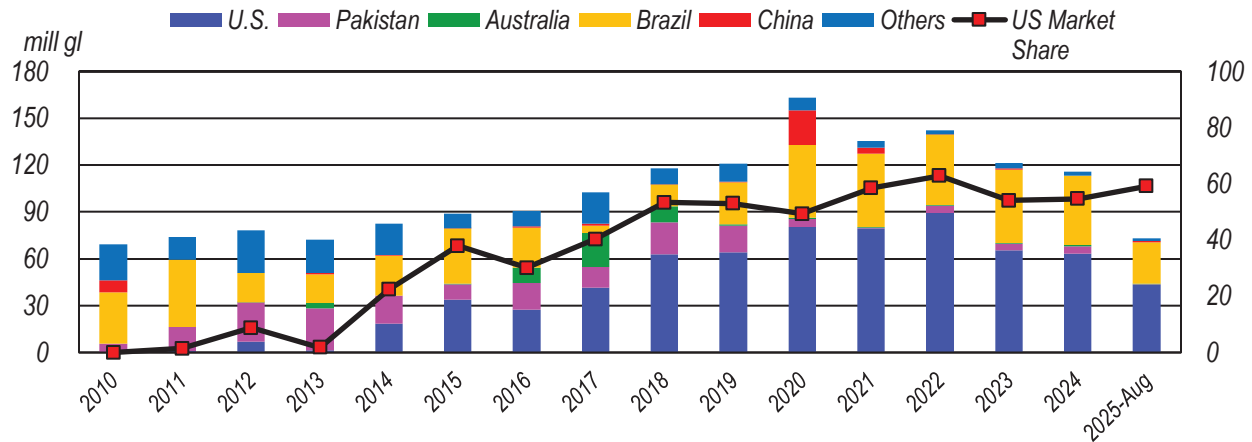
MARKET INFORMATION

U.S. ethanol imported in Jan-Aug down 1.9% year-on-year to 43.2 million gallons

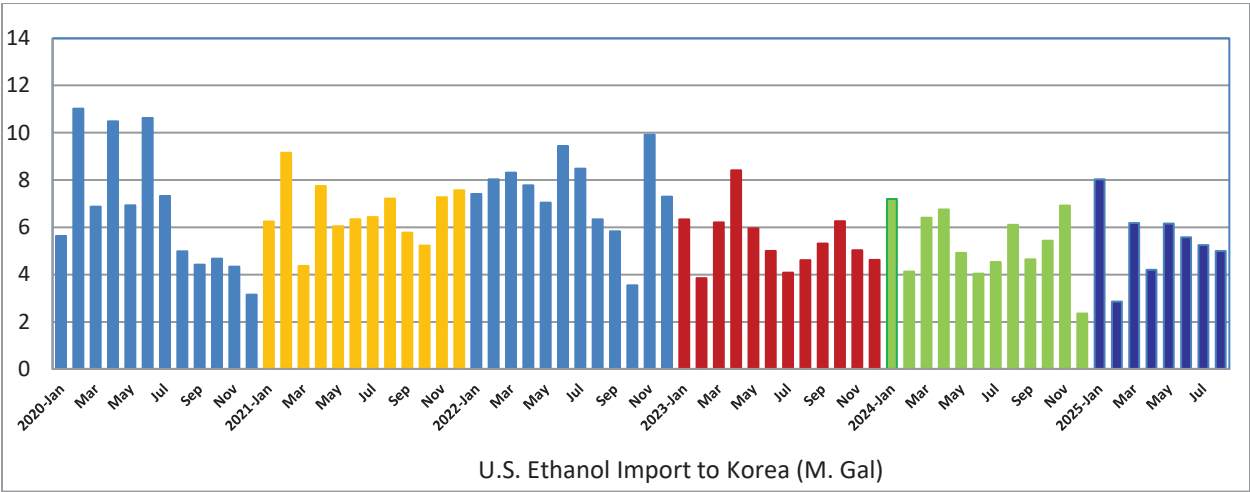
South Korea's total ethanol imports were 73.1 million gallons, down 3.4 percent from the same period in 2024. Of the total ethanol imports, 40.1 million gallons, 56.2 percent, were used for industrial purposes, and 33.0 million gallons, 43.8 percent, were used for beverage alcohol. Meanwhile, U.S. ethanol imports amounted to 43.2 million gallons, accounting for 59.1 percent, down 1.9 percent from the previous year. Most of the ethanol imported from the United States is consumed for industrial use. And Brazilian ethanol was imported at 26.6 million gallons, up 2.1 percent from the previous year. 1.2 million gallons were imported from South Africa and 2.1 million gallons from other countries. These import statistics do not include the volume of transshipment exports of U.S. ethanol through the bonded area of Ulsan Port.

The decline in imports of industrial US DDGS is due to the impact of decreased consumption, such as the construction recession, and the impact of Chinese ethyl acetate, which has nearly doubled since the abolition of dumping duties on Chinese ethyl acetate in 2024. From January to August 2025, Chinese ethyl acetate imports amounted to 36,275 tons, a 34.4% increase compared to the same period last year.

U.S. Ethanol Imports, 2010 – August 2025



Monthly U.S. Ethanol Imports, 2020 – August 2025



South Asia Regional Update

PROGRAM REPORTS

Indian SAF stakeholders travel to the U.S. to learn about ethanol's role in Indian SAF space

During the week of September 7, 2025, stakeholders from India's aviation fuel sector visited the U.S. and met with regulators, researchers, carbon score certification firms, and airlines to discuss ethanol's role in the push for SAF inclusion in air travel in India.

India has mandated an SAF blend of 1 percent in 2027, 2 percent in 2028, and 5 percent in 2030, and the newly edited CORSIA model allows a pathway for alcohol to jet technology to be used in these blends. As India ramps up its ethanol production, it is imperative that this ethanol be used for SAF, and U.S. ethanol could also play a role in SAF production in India. India is looking to be a refueling hub for SAF, and it is likely that they could buy U.S. ethanol for air travel in the near future.

The team was comprised of Indian researchers, oil marketing companies, investors, and airlines. The goal of the trip is to incentivize investment in alcohol to jet SAF production in India, as plants have yet to be established. The team's meetings with Argonne National Laboratory, United Airlines, and U.S. regulators successfully encouraged investment in alcohol to jet SAF production, as following the trip, Reliance Industries announced that it would plan to bolster its already planned production at its Jamnagar plant, which is slated to start production in late 2026.

Governor Reynolds travels to India, Council hosts various activities and debrief

Iowa Governor Kim Reynolds visited India in September 2025 to bolster partnerships with Indian industry and explore ways to export Iowa commodities to India. The Council acted as a key partner in hosting the governor and her team, comprised of trade associations from Iowa.

The Council facilitated a marathon meeting with Praj Industries, an ethanol technology provider interested in FDI in Iowa. Praj has proceeded to create a working group with the Iowa Economic Development Authority, as they believe they have affordable technology for U.S. farmers to capture the 45Z credit, as well as modular SAF plants that can allow ethanol producers to more affordably produce SAF and pass their earnings on to U.S. farmers.

Following the visits, the Council hosted a debrief, where it discussed the various agricultural export opportunities in India, including corn, soy, soybean meal, sorghum, DDGS, and ethanol. It also discussed the challenges for industries like dairy and pork, as political and consumption challenges persist. The visit culminated with a reception hosted by the Council, during which the leaders from the feed industry were able to interact with the delegation.

MARKET INFORMATION

India:

- As of August 31, 2025, the final allocation for ethanol supply is 11.32 billion liters and 11.317 billion liters have been contracted for EST 2024/25. In the 10 months (November

through August 2025), 8.205 billion liters have been received, and 8.42 billion liters of ethanol has been blended with the average blend rate of 21.98% based on gasoline sales of 46.75 billion liters. Of the total ethanol supplies, 64.11% of supplies are via the grain route and the rest 35.89% from the sugar sector. Of the total, 44.76% ethanol is via corn and 9.66 MMT of corn has been used. Of the 5.2 MMT FCI Rice allocated, 2.18 MMT of FCI rice has been used and 1.42 MMT of damaged food grains has been used from open market.

- The new tender for ethanol supplies for ESY 2025/26 has been floated and is for 10.50 billion liters. For Q1 3 billion liters; Q2 280 billion liters; Q3 250 billion liters and Q4 220 billion liters. In ESY 2024/25, the tender was for 9.16 billion liters and later new tenders/allocation were added and the final is 11.317 billion liters, 23.54% more than the first demand. For ESY 2025/26 it is expected that the new tenders will be put out later for every quarter and the final demand of ethanol for blending could be 12.35-12.5 billion liters, adding almost 18% to the demand. India has the capacity to produce this much ethanol.
- The Indian government has notified the export of second generation (2G) ethanol to be exported. Companies making 2G ethanol from cellulosic material for fuel and non-fuel purposes will need a valid export authorization and feedstock certification. 2G ethanol is made from non-food materials like bagasse, wood waste, agricultural residues, grasses, algae, and other renewable resources. On the other hand, Reliance Industries is putting up the world's largest SAF plant in Jamnagar, in the refinery complex and will be majorly for export of SAF to Europe.
- All ethanol imports to India are on stand still as U.S. prices are higher. Crushing is expected to start in November, but local supply of ethanol from c-heavy molasses for industrial use will only start in Nov 2025.

7b. ASTM & NCWM Updates

October 2025

Chuck Corr, CC Consulting, LLC

CWMA Interim Meeting

The 2025 CWMA Interim Meeting was held September 29 to October 2 in Dubuque, IA. The meeting was well attended. There were relatively fewer items than normal on the entire agenda. The testimony in open hearings went very quickly and ended ahead of schedule.

The CWMA Annual meeting will be held in Wichita, KS in the spring.

Proposal from API

Some fuel terminals blending gasoline measure the volume using certified meters after the ethanol is blended in. Some terminals use certified meters to measure the hydrocarbons and ethanol separately before blending. Those terminals add the hydrocarbon and ethanol volumes to report the volume shipped. The final volume of the blend is slightly greater than the sum of the two components. Some terminals measuring the components separately began to alter the shipping volumes by calculating the increased volume. Illinois Weights and Measures officials identified instances of this occurring in Illinois. This alteration of volumes is not allowed in Illinois.

The API developed their own standard to calculate the volume increase in the blend. They have an item on both the L&R and S&T agendas to include this standard and volume calculation into Handbooks 44 and 130. There was considerable discussion about these items at this meeting. The API is pressing to have these items as voting items at the NCWM annual meeting in July. Several oil company representatives and the API representative spoke in favor. I spoke against the proposals (representing myself). Kristy and a good number of weights and measures officials also spoke against the items. An Illinois W&M official is leading the effort against the proposed changes. I will work with him in preparation for the January Interim NCWM meeting. These items will also be discussed at the January Fuels and Lubes Subcommittee meeting in January.

Talking points related to API proposal at NCWM

Accuracy of measurement

- Weights and measures officials and regulations stipulate that custody transfer meters meet requirements for capability and accuracy. These meters are periodically tested and verified by the W&M officials.
- The volumes reported should be traceable to basic W&M standards.
- This volume correction the API has proposed has been referred to as an estimate.

Variability of the product

- The impact of blending ethanol is dependent on the specific hydrocarbon makeup of the BOB. (e.g. octane response, T50 change, & vapor pressure increase)
- The API proposal implies that impact of ethanol is very predictable by knowing the density of the BOB.
- The API standard was based on data using 4 hydrocarbon samples. It is unclear how these samples represent the full range of variability in the BOB composition.

Origin and use of the standard

- The standard API want to rely on was internally developed by the API.
- They say industry standards should be adopted by NCWM.
- This volume increase standard is part of a larger API standard for transferring product.
- There is precedent for only using parts of a standard but not the entire standard.
- The fuel industry has petitioned a number of jurisdictions to be exempt from parts of the ASTM gasoline standard. These same stakeholders are very quick to ask the jurisdictions to act very quickly to adopt recently approved changes to the standard that work in their favor.

There are alternatives

- The API want to charge for the volume increase in the blend.
- The terminals without a meter for the blended product would alter the pricing based on the calculations. The pricing is agreed to by the buyer and seller.
- Terminals can add a meter
- The terminals want to charge for the expanded volume without actually measuring the volume.
- Any terminal that does not have a meter for the blended product could add a meter at that location. It is a simple business decision by the terminal.

7c. IEDA Tax Credits Rulemaking

7d. Iowa Dept. of Revenue – Biodiesel Production Tax Credit



Biodiesel Production Tax Credit

Based on data released by the Iowa Department of Revenue

Quarter	Number of Plants	Total Gallons	Total Dollars
2025 Q3	4	25,196,761*	\$1,007,870
2025 Q2	6	51,328,191*	\$2,053,128
2025 Q1	6	52,871,993	\$2,114,879
2024 Q4	3	11,557,175*	\$462,286
2024 Q3	4	40,292,161*	\$1,611,687

**One or more facilities reached the maximum of 25 million gallons eligible for the credit annually.*

7e. USDA NRCS State Technical Committee

USDA STATE TECHNICAL COMMITTEE MEETING

Neal Smith Federal Building - 210 Walnut Street, Room 693, Des Moines, Iowa
NRCS Hugh Hammond Bennett Conference Room/Microsoft Teams

September 18, 2025

1:00 P.M. – 3:00 P.M.

Minutes

Opening Comments – Jon Hubbert

- Welcome and call meeting to order.
- Introduction of attendees
 - Introduction of new member: Lisa Stark – Iowa Valley RC&D (IVRCD).
- Approval of minutes from June 12, 2025
 - No comments or corrections were noted by the committee.
 - Minutes from June 12, 2025, were approved as written.
- Review of Recommendations from previous meeting
 - EQIP Recommendation: Identify interested people to step into the role of Chair for the EQIP subcommittee.
 - No approval needed.
 - SWP Recommendation: Add one watershed for Osceola Rural Water System North which finished its plan this past year and have wells that are highly susceptible to agricultural runoff. This watershed is a total of 33,226 Acres and allows Iowa to remain under the 20% area limit.
 - Approved and added.
 - SWP Recommendation: Add Marty Braster as SWP subcommittee co-chair.
 - Approved and added.

Agency Updates – General

NRCS – Jon Hubbert

National Leadership Team Meeting Updates

- Chief Bettencourt's priorities.
 - Internet connectivity for all offices.
 - Iowa has 12 offices that have not been upgraded to Lumen. Any office not on Lumen by September 30 will be upgraded to StarLink.
 - Integrated Field Tools.
 - NRCS has 5 “trains” of tools to help workflow – further integration of these tools to ensure they are functional, not conflicting with other tools, and operating within the bandwidth available in the offices.
 - Process streamlining.
 - The Chief believes NRCS mission has become very wide, but not deep as it has started doing more things and collecting more ideas.
 - The Chief wants to provide a more narrow and deep focus for NRCS.
 - Looking more at what needs to be done from a statutory process and trimming processes that have led to our focus becoming wide and shallow.
 - Maximize and optimize work with partners.
 - Partners should be a “force multiplier” for conservation.
 - Beyond outreach to more “boots of the ground” conservation work and technical assistance
 - Giving credit where credit is due.
 - Giving credit to producers that are putting conservation practices on the land.

- Measuring benefits and looking at outcomes of the programs or the implementation of practices that are occurring.
- Precision Ag.
 - Modernizing NRCS and our innovations to work more closely with innovators in the agricultural world that are using precision ag and related tools.
- The political team that has been brought into NRCS has a strong production ag background.
- Chief Bettencourt wants to put the agency back in connection with the field more than in the past few years – working with producers, being on their land and helping them to understand conservation and implementing conservation.
- Chief Bettencourt also brought up the need for each state to have a strategic plan.
 - Iowa's previous strategic plan ended in 2024.
 - Need to focus on what is our goal in Iowa for putting conservation on the ground.
 - Will involve working with many stakeholders.
 - Jon will be looking to the STAC for feedback on our strategic plan and using feedback from local conservation work group strategic plans that have been developed over the last few years.

Other NRCS Updates

- Critical vacancy process
 - 4 critical vacancy positions were filled through this process – 2 were transfers from out of state and 2 were reassignments from in-state staff.
 - The 2 in-state reassignments created critical vacancies in the positions they left.
- Hiring freeze continues through October 15.
 - Current staff: 389.
 - The inability to fill critical positions is leading to some gaps in service to customers.
- Archaeology reviews are very backlogged and we are hearing about major service gaps from customers, contractors, and others. – currently have no archaeologist on staff.
 - We have gotten field assistance from archaeologists in Nebraska and Illinois, but the time they have available is limited.
 - We are in the final stages of developing an agreement with the University of Iowa, Office of the State Archaeologist.
 - Once this agreement is in place, it will help with the backlog of desktop review work.
- Engineering is another workload with major gaps in service.
 - Impacts staff down to the field offices and the ability to do design work on structural practices.
 - Iowa is continuing to do structural practices, but the work is delayed – some states have had to back out of doing structural practices as they don't have the staff to support it.
- Advisory budget allocation has been received.
 - This is not based on dollars that have already been committed, rather it is based on speculation.
 - We are not guaranteed the amount that is in the advisory allocation.
 - Dollars for EQIP, CSP, RCPP, and ACEP that are in the advisory allocation are relatively solid as they have been voted through with the reconciliation bill.
 - Amounts for these programs are above our normal Farm Bill allocation compared to previous years. Not as high as Farm Bill plus IRA in the recent past.
 - CRP and Conservation Technical Assistance (CTA) were not part of the reconciliation bill and we continue to monitor their development.
 - CTA is the fund used for routine conservation planning, state cost share support, compliance, some watershed operations, and many other activities.
- *Johnson: will the archaeologist and engineering positions be transfers due the hiring freeze or are they open positions?*

- *Hubbert: We are unable to fill these positions though normal hiring due to the hiring freeze and we are unsure if another critical vacancy process will be opened. The hope would be to bring in new staff for these positions once the hiring freeze is lifted.*
- *Papanicolaou: can New Solutions be used for hiring?*
 - *Hubbert: we have an agreement with New Solutions and would utilize them, but due to the hiring freeze, and a related executive order, we cannot add any new positions.*

FSA Update – Curt Goettsch

- Hiring freeze is impacting FSA.
 - Currently the Polk County FSA office in Ankeny is only open on Wednesdays – due to not being able to fill open positions.
- FSA offices are getting ready for year-end and close out of the fiscal year.
- A limited number of CRP payments will be issued on October 2 – very small number of contracts that were part of the Re-enrollment and Extension (REX) process from 15+ years ago.
- Most CRP payments will be issued beginning on October 16.
- ARC county payments (41 counties in Iowa) will begin being issued on October 8 – mostly northern counties for crop year 24.
- Ongoing Disaster Programs: Supplemental Disaster Relief Program (SDRP) and Emergency Livestock Relief Program (ELRP) for flooding and wildfire.
 - ELRP assists producers that had to purchase supplemental feed for crop years 23 and 24 due to forage losses in crop years 23 and 24.
- Marketing Assistance Loans start to process as producers start harvesting.
- Karen Rawson is still the Acting State Executive Director - Iowa is 1 of 3 states that has not named a new permanent SED.
- *Carlson: How do farmers know when offices are open or closed?*
 - *Goettsch: currently only the Ankeny office is impacted and they put out media releases and email blasts to all customers attached to that service center.*
- *Stark – what are hours for Polk County. office?*
 - *Goettsch: 8:00am – 4:30p Wednesdays.*
 - *Hubbert: NRCS desk in the Polk County office is still open for regular business hours, Monday – Friday.*

Local Workgroup Feedback – Dien Judge

- Planners have started the process and meetings have begun occurring.
- Webster, Wright, Kossuth Counties have completed their planning process.
- Worth County has an upcoming local workgroup meeting.
- Dien will be reaching out to have a follow up meeting with NRCS as the Local Workgroup process progresses.

Technical Topics

Minimal Effect Tool Pilot Introduction – Julie McMichael (see attached PowerPoint)

- Minimal Effect background overview.
 - Food Security Act of 1985 – provision stating there must be a compliance portion to protect wetlands.
 - Producers come to NRCS wanting to do “something” (tile, terrace, something to fix something on their land).
 - They would sign an AD-1026 form with FSA requesting to do “something.”
 - If the “something” is deemed to impact a wetland, this tool could be run to determine if that wetland activity would have minimal effect on the area.
- A minimal effect procedure was brought to the STAC in 2019 – it was not finalized.
- A National Bulletin was published stating that a minimal effect procedure is necessary.
- Iowa Compliance team hosted the national pilot for minimal effect training in 2024.

- Working with the Prairie Pothole Region (Minnesota, North Dakota, South Dakota, Iowa) to be as consistent as possible with procedures.
- Overview of the National Template-NRCS Minimal Effect Procedure and Decision Matrix IA Interim Document. *(attached)*
 - Items in red are Iowa-specific – the rest of the document is a national template.
 - A national template was created so there is a level of consistency within the states.
 - The minimal effect procedure will need to go to the Federal Register upon adoption for public comment
- Walkthrough of the minimal effect procedures.
 - The procedure looks at what happened to the wetland and was the action important – how wildlife, water storage and connectivity are impacted.
 - If a wetland is removed, farmed, tiled, etc., are there other wetlands to perform the same functions of that wetland in the area.
 - Proposing a 2-mile radius to be used as the area of consideration around the wetland.
- *Palmer: Can you explain the term minimal effect?*
 - *McMicheal: If you have a wetland, is it ok to do something or perform an action and will the action affect the area, wildlife, water quality, or flood storage? If the answer is no, it won't affect these things, then it is ok to perform the action. A label or exemption will be put on that area with the Food Security Act of minimal effect.*
 - *Hubbert: Minimal effect is not acres driven, its function driven – not the number of acres of the wetland, but to the functions and values of that wetland.*
- *Isenhart: How does the minimal effect procedure interact with pending changes to the definition of protected wetlands under the Clean Water Act?*
 - *Hubbert: The Clean Water Act is separate legislation than the Farm Bill wetland compliance requirement. Minimal effect is not part of the Clean Water Act, only part of the Farm Bill.*
- *Isenhart: When you're assessing the impacts, an area does not have to be considered a water of the United States to be impacted?*
 - *McMichael: Minimal effect is for compliance purposes only. The producer would have to go to the US Army Corps of Engineers (USACE) to determine if the wetland is also a waters of the US wetland. We do let the producers know that they need to contact USACE and the paperwork states that this does not clear the producer except for USDA compliance purposes only.*
- *Barnhart: Would the 2-mile radius make it easier or harder to get something done?*
 - *Hubbert: it depends on what is in that 2-mile radius.*
 - *McMichael: Pros and cons of the area size are in the presentation (see PowerPoint attached). Deciding on a 2-mile radius was somewhat arbitrary, chosen to hopefully capture some wetlands and be defensible to a degree – It's not too small and not too big. Having a set radius allows for simplified tools – put a 2-mile buffer at the center point of the wetland and see what is captured.*
 - *McMichael: Looking at parameters, like the 2-mile radius, is one purpose of having this as an interim procedure for a year. Data can be collected and look at if this is a usable factor.*
- *Stark: Is the 2-mile radius based on other states in the prairie pothole region?*
 - *McMichael: Yes, North Dakota, Minnesota, and Wisconsin are all using a 2-mile radius and it was chosen based on recommendations from their STACs. To be consistent with neighboring states, Iowa has chosen to start with a 2-mile radius.*
 - *McMichael: Louisiana is the only state using HUC 14, and it has already been sent to the Federal Register. It would take time to develop HUC 14 areas for Iowa to run in the tool, but his process was started in 2019, so some groundwork has already been completed. One advantage of using HUC 14 is that once the tool is run, it's done. With a 2-mile radius, you must run the calculations for every project site.*
- *Palmer: In terms of the 2-mile radius, if this is going to be the value of that wetland in comparison to other wetlands in the 2-mile radius, or is it going to be based on what does the loss of that wetland means to the wildlife and flora and fauna? Has mitigation been investigated?*

- *McMichael: Minimal effect is looking at the wetlands as a whole in the area – can the function remain if one goes away.*
- *McMichael: Regarding mitigation – Mitigation is when a farmer has a wetland that is not minimal effectible, but they want to do the “something”. Mitigation is a tool that can be used to have that discussion. Iowa has been piloting a separate interim mitigation tool for the past year with great results.*
- Discussion on how to proceed and if more discussion is needed for the STAC to understand the tool.
 - A separate meeting will be scheduled for STAC members who are interested in learning more details about the Minimal Effect Tool.
 - **This has been scheduled for October 1, 2025, from 10:00am – 12:00pm.** If you did not receive an Outlook invite, please reach out to Keiko at: keiko.sampson@usda.gov.
- Julie is asking for the STAC to provide comments on the Interim Minimal Effect Procedure by October 31, 2025.
- After this comment period, (pending review of State Technical Advisory Committee input and State Conservationist approval) the Compliance team will start using the tool on an interim basis for 1 year. Once that year is complete, Julie will bring results back to the STAC for approval.

National Mitigation Tool Pilot Update – Julie McMichael (see attached PowerPoint)

- Julie presented a pilot for the National Mitigation Tool to the STAC in September 2024.
- Reasons to consider use of the tool:
 - Farmer First approach.
 - Best interest of the customer.
 - Required to have a tool per policy.
- Tool creates consistency both within Iowa and Nationally.
- Summary of the Mitigation Procedure testing results.
- Conclusions:
 - Creates consistency within Iowa and nationally.
 - Provides better communication with customers.
- Julie proposes the adoption of the mitigation tool for use.
- *Johnson: There are some producers that have fens – how could they access this tool if they have a fen?*
 - *Hubbert: this tool would only be used if they are trying to eliminate or remove the fen and are trying to find ways to mitigate it.*
- *McClure: This tool would not be enacted when trying to add an oxbow? Restoration of silted oxbow?*
 - *McMichael: No, this is only in terms of compliance if doing something to mitigate for compliance purposes.*
- Meeting will be scheduled for more discussion (within 30 days) and will hold on this topic until after this meeting.
 - **This has been scheduled for October 1, 2025, from 1:00pm – 2:00pm.** If you did not receive an Outlook invite, please reach out to Keiko at: keiko.sampson@usda.gov.

Status of Farm Bill Programs

Programs Report – Sam Adams

- See report (attached with agenda).
- A list of acronyms is included with the Programs report.
- Sam provided an overview of the easement closing process.
- Batching dates: ACEP – October 31, EQIP, CSP, RCPP – October 10.
- Will be needing input from EQIP, CSP, and ACEP subcommittees on the changes for FY2026.
- *Stark: Have the 10 resource concerns been identified?*
 - *Adams: The 10 resource concerns will be going back to the traditional SWAPA (Soil, Water, Animals, Plants, Air) system.*
- *Aker: Any updates on payment scenarios?*

- *Adams: Looking to identify payment scenarios that are not being utilized and eliminate them, but no guidance has been given to the states yet.*
- *Hubbert: Likely more changes to payment scenarios in 2027.*
- *Johnson: Does the national office have a definition for regenerative ag?*
 - *Adams: Have not received an official definition in writing. Sometimes an official definition is not stated – small-scale agriculture is an example.*
 - *Hubbert: It does involve soil health and what we are putting in and taking out and making sure we're balancing the system. Looking at how we are focusing on long-term production and sustainability as opposed to just a production goal.*
- *Johnson: Will precision ag tools be part of regenerative ag?*
 - *Hubbert: Precision ag is also a priority for the agency and the Chief. It is possible that it will be folded into regenerative ag, but it won't be the only aspect of it. Precision ag might be a component of regenerative ag and a component of CSP enhancements.*
- *Palmer: What would be a good process for stakeholders or customers of a Soil and Water Conservation District (SWCD) to provide suggestions for helping to define regenerative ag?*
 - *Hubbert: Not looking to define it and tell NHQ how to do it. But if you have thoughts and want to share those thoughts, please share them with Jon.*
 - *Adams: SWCDs are a great advocate to send ideas on behalf of.*
- *McClure: Is every state defining regenerative or will there be a single definition?*
 - *Hubbert: We will be told what we are working with for FY26 by NHQ, beyond that, we don't know. Likely that Iowa won't have a definition different from a national definition if one is given.*

Partnerships update – Scott Cagle

- *See report (attached with agenda).*
- *McClure: There is concern regarding CPA-52s being required for all Advancing Markets for Producers (AMP) programs prior to implementation of cover crops in the Farmers for Soil Health program. If this comes to fruition, it will eliminate any cover crops signups for the fall of 2025 because the form will not be filled out prior to cover crop planting this year.*
 - *Cagle: Partnership for Climate Smart Commodities, is now AMP. This is not an NRCS program, so we can't answer.*
 - *McClure: This is going to go through the NRCS planner and approval portal. Will follow up with Todd Sutphin.*
 - *Hubbert: The requirements may not be something we have control over, but we will work with AMP sponsors and agreement holders. The CPA-52 process is generally not a hard process – a few things will trigger a closer look, but it's easy to take existing cropland and add cover crops.*
 - *Palmer: Wouldn't it depend on if there is an extension of cover crop planning date? If it were extended until December 1, would that give enough time to fulfill the AMP agreements?*
 - *Hubbert: Date of cover crop seeding wouldn't make much difference. The AMP point of contact, Nicky Williams, can move through them quickly once received.*
 - *McClure: What is the value of the CPA-52 and cover crop on row crop land? You're not disturbing the soil any differently.*
 - *Hubbert: Correct, the soil isn't being disturbed differently but need to watch for places where new ground is breaking into production and cover crops could be a practice.*
 - *Adams: The CPA-52 is necessary because there is a federal action and NEPA is documented through the CPA-52.*
 - *Carlson: Will Nicky Williams do field visits if needed for the AMP CPA-52s?*
 - *Hubbert: NRCS only does a desk review and the local sponsor is required for anything beyond a desk review.*

CRP Report – Curt Goettsch

- *FSA has accepted 1.78 million acres into CRP this year.*

- <https://www.fsa.usda.gov/news-events/news/09-17-2025/usda-accepts-nearly-18-million-acres-2025-cons...>
- 810,000 acres in grassland CRP, 203,000 acres in general CRP, 789,000 acres in continuous CRP.
- Iowa accepted offers – not approved contracts:
 - Grassland: 484 acres from 10 accepted offers
 - Continuous: 118,226 acres – 103, 757 re-enrolled, 14, 470 new
 - General: 4916 acres from 299 accepted offers.
 - Total: 8954 offers for 123,626 acres accepted for enrollment.
 - Net loss of about 29,414 acres.
- Authority to have CRP signups ends on September 30 and will need to be reauthorized by lawmakers.
- Iowa leads nation in total contracts and total offers accepted for CRP.

Subcommittee Reports

CSP – Cynthia Farmer

- No recommendations were made by the subcommittee.
- Rubyana Neely provided the subcommittee a Programs update
 - All Program goals were met, even with the loss of IRA funding.
 - Funds were spread well across the categories this year.
 - Over 1000 applications were submitted for FY25 – only 318 are obligated or selected for funding.

EQIP – Nick Baumgarten

- See report
- **Recommendation: Approve Paige Frautschy as the new chair of the EQIP subcommittee**
 - **Jon approved Paige Frautschy as the new chair.**

ACEP-WRE – Kelsey Fleming

- See report
- **Recommendation: Utilize the Prioritization Tool for FY26 – provided the high selected projects collectively represent the four wetland classes in proportions consistent with the Iowa Wetland Restoration Criteria and Guidelines.**

ACEP-ALE – Sam Adams for Ryan Smith

- No recommendations were made by the subcommittee.
- Discussed capacity for ALE applications and the challenges of monitoring.
- Subcommittee discussed working through applications and making sure that those entities can meet the obligations of the ALE application because they are holding a conservation easement that has a lot of value.
- Moving ALEs to having surveys done due to the number of issues with ALE applications following common land use (CLU) boundaries that are not accurate.

CRP – Curt Goettsch

- Did not meet

SWP – Christina Murphy

- Did not meet

Urban Ag –Tim Palmer

- See report
- No recommendations were made by the subcommittee.
- Subcommittee discussion focused on nexus points to combine school lunches and community growing/production.
- *Isenhardt: Previously suggested engaging the Iowa Food Systems Coalition in the subcommittee, has there been any movement or contact?*
 - *Palmer: Will investigate that recommendation.*

Reports from Other Committee Members

- Dave Petty – Thank you to Nick Baumgarten for his leadership on the EQIP subcommittee.

Guest participation

- None

Closing Comments – Jon

- Thank you everyone for attending.
- An additional meeting will be scheduled for the 2 compliance technical topics presented today.

Future Meeting Dates

December 18, 2025

Attendance

In-Person

Jon Hubbert, NRCS
Dien Judge, CDI
Kelsey Fleming, IDNR
Sam Adams, NRCS
Will Myers, IDALS
Rubiana Neely, NRCS
Jessica Downey, NRCS

Julie McMichael, NRCS
Scott Cagle, NRCS
Keiko Sampson, NRCS
Susan Kozak, IDALS
Regan Davis, CDI
Jaia Fischer, NRCS
Patrick Chase, NRCS

Virtual

Curt Goettsch, FSA
Angela Barker, INSGA
Bruce Barnhart, LICA
Todd Bogenschutz, IDNR
Ben Lehman, Rodale Institute
Jeff Jensen, Trees Forever
Cameron Aker, Trout Unlimited
Marty Braster, Regional Rural Water Association
Sharyl Bruning, IFBF
Joe McClure, Iowa Soybean Association
Josh Divan, Pheasants Forever
Thanos Papanicolaou, NLAE
Mark Heckman, Iowa Renewable Fuels Association
Paige Frautschy, TNC
Joan Flecksing, Meskwaki Tribe
Dan Paulsen, NRCS
Oliver Lincoln, FWS
Heather Jobst, INHF
Tim Palmer, NACD
Catherine DeLong, ISU
Cora Fox, Ducks Unlimited
Shawn Richmond, IFBF
Sarah Carlson, PFI
Keegan Kult, Agricultural Drainage Management Coalition

Dave Petty, Iowa River Ranch
Wendy Johnson, Climate Land Leaders
Ashley Utt, Pathfinders RC&D
Chuck Isenhardt, Dubuque Area Land & Water Legacy
Cynthia Farmer, Center for Rural Affairs
Jeff Lucas, IAWA
Nick Baumgarten, IDNR

7f. ISU Grain Quality Initiative Advisory Committee