October 10, 2025

The Honorable Marco Rubio
Secretary of State
U.S. Department of State
2201 C St NW
Washington, DC 20451

Re: IMO Net-Zero Framework Engagement

Dear Secretary Rubio:

On behalf of America's biofuel producers and the farmers who supply biofuel feedstocks, we write to urge the United States to continue its active involvement in discussions surrounding the International Maritime Organization's (IMO) Net-Zero Framework for maritime fuels. As the IMO's Marine Environmental Protection Committee prepares to consider formal adoption of the Net-Zero Framework at its upcoming meeting in London, we encourage U.S. leaders to remain constructively engaged in the process to ensure the interests of U.S. biofuel producers, farmers, marine shippers, and consumers are represented.

While we share the Administration's concerns with certain elements of the pending framework, we recognize that IMO standards for low-carbon marine fuels—with appropriate modifications—could greatly accelerate the development of an important international market opportunity for U.S. biofuels and farm products.

U.S. biofuels such as ethanol, biodiesel, renewable diesel, renewable natural gas (RNG), biomethanol, and bio-LNG are commercially available, made-in-America alternatives to traditional maritime fuels that can meet the IMO's clean fuel goals. An appropriate Net-Zero Framework will drive support and expanded demand for U.S. agricultural and waste resources and therefore support American farmers, biofuel producers, and the rural communities that power them.

Key benefits of accelerating the use of domestic, bio-derived maritime fuels include:

- Ensuring U.S. dominance in an emerging global market;
- Enabling immediate emissions reductions from commercially available alternatives to traditional maritime fuels;
- Facilitating U.S. biofuels' role as the foundation for next-generation alternative maritime fuels;
- Leveraging existing U.S. infrastructure, including ports with biofuel and liquified natural gas bunkering capabilities; and
- Enhancing the economic resilience of U.S. farmers and rural American communities.

It is important to note that marine shippers could meet the Net-Zero Framework's carbon intensity reduction targets simply by using cost-effective U.S. biofuels that are commercially available at scale today.

We share concerns about the cost and availability of certain unproven maritime fuel options that are not economically viable or commercially obtainable in sufficient volumes today. Forcing the use of such fuels could indeed raise costs for marine shippers, ultimately increasing prices for consumers. However, with your leadership, the Framework can be developed in a way that protects U.S. consumers by ensuring the IMO program embraces a diversity of fuels readily available in the marketplace today and recognizes the full lifecycle emission reductions achieved by U.S. biofuels. Both factors are key to keeping costs of compliance low and positioning U.S. fuel producers to lead. We share the Administration's concerns with overly restrictive EU policies regarding biofuel feedstocks and support the Administration's opposition to these, or similar, restrictions being incorporated into any IMO Framework.

While these concerns exist, they can be mitigated through the Administration's thoughtful leadership, thereby helping U.S. biofuels producers and farmers access the substantial benefits of developing a robust global maritime market for U.S. biofuels. The near-term IMO Framework will accelerate demand for U.S. bioenergy-derived resources, catalyze private sector investment, and advance American energy security and rural jobs while keeping U.S. marine shippers and exporters competitive within their international peers.

We strongly urge the U.S. to maintain its seat at the IMO table and play a leadership role in advancing and implementing a workable Net-Zero Framework that opens new market opportunities for U.S. biofuels made from U.S. agricultural feedstocks and waste streams.

Respectfully submitted,

Advanced Biofuel Association
American Biogas Council
Clean Fuels Alliance America
Coalition for Renewable Natural Gas
Growth Energy
National Corn Growers Association
National Farmers Union
Renewable Fuels Association
U.S. Grains & BioProducts Council

cc: Admiral Kevin Lunday, Acting Commandant of the U.S. Coast Guard
The Honorable Chris Wright, Secretary of Energy
The Honorable Brooke Rollins, Secretary of Agriculture
The Honorable Sean Duffy, Secretary of Transportation
The Honorable Howard Lutnick, Secretary of Commerce