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Export Sales Reporting Program of U. S. Agricultural Commodities

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Comment on FR Doc # 2023-10250

Submitter Information

Organization: International Feed Corporation

General Comment

The proposed changes to the USDA weekly export reporting system will not effectively help the "trade" understand the market with any greater confidence than before the proposed changes. The proposed changes increase grain settlement and accounting reconciliation workload on exporters, reduce customer and supplier confidentiality and increase the risk to leaks of company specific information without providing positive benefits to exporters. Small changes to the weekly reporting requirements that increase efficiency of reporting are welcome. However, the proposed changes do not increase efficiency. Grain settlement, logistics and accounting personal within exporting companies will experience increases in reporting workload and time demand required to report more detailed information required by the proposed changes. Exporters will be required to assume the cost of the increased workload without receiving benefit from the increased level of detail. Further, smaller exporters will be more easily targeted by larger competitors once mode of transport is added to the weekly report. The proposed changes require exporters to divulge confidential customer information like names, contract quantities and destinations, none of which are required to effectively report weekly sales in compliance with current US regulations. The proposed move to include customer specific information, whether intended or not, is a step toward oversight by the USDA which is beyond the scope of the weekly reporting requirements. My company is not supportive of the changes which drive increased non value added work and reduce the confidentiality of customers and trade without providing increased tangible benefits to exporters of all sizes. Please do not implement the proposed changes.