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July 14, 2023

Amy Harding
Foreign Agricultural Service
U.S. Department of Agriculture
1400 Independence Avenue SW
Room 5531
Washington, DC 20250

Reference: Notice of Request for a Revision of a Currently Approved Information Collection

Export Sales Reporting Program of U.S. Agricultural Commodities
Foreign Agricultural Service, U.S. Department of Agriculture

OMB Number: 0551-0007

Dear Ms. Harding:

ADM appreciates the opportunity to comment on the Foreign Agricultural Service's proposed amendments to the Export Sales Reporting System. ADM is a global leader in agricultural origination, processing and export. In the U.S., ADM operates 82 processing and 237 procurement facilities. These facilities enable the movement of corn, wheat, soybeans and their products and co-products to our domestic and international customers. The products move on our extensive truck, rail and river-based transportation network. Much of the product destined for export travels on one of our 29 tow boats or in one of our 1800 barges and passes through our export terminals on the Gulf Coast. Given ADM's role as a major exporter of U.S. ag products, we have been an active respondent to the Export Sales Reporting Program since the system's inception.

ADM fully supports the objectives of weekly export sales reporting and its role in enhancing market transparency. In the past, the system required respondents to report weekly sales, using aggregated data by commodity, country and marketing year basis, with data reconciled on a quarterly basis. The new system increases the volume of information required on a contract-by contract basis which increases the importance of data reconciliation.

ADM's concerns mirror those reflected in the comments submitted by the North American Export Grain Association (NAEGA) and wishes to underscore the importance of improving the ability to reconcile data. When the new system was launched last year, ADM confronted countless system errors and challenges reconciling data for weekly reports and at contract fulfillment, often many months after sales were first reported, requiring hours of staff time to troubleshoot. Errors occurred and data inaccuracies were discovered when attempting to make routine amendments, such as volume over/under fills. Common occurrences such as shipment date changes or destination changes are not accommodated and increase the potential for errors.



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ADM appreciates FAS' outreach and solicitation of input throughout the development of the new system. ADM staff members responsible for collecting and reporting weekly export sales information participated in multiple training sessions and provided constructive feedback throughout the design of the system. ADM commends FAS' efforts to include industry throughout the process, however we remain concerned that as currently designed, the updated Export Sales Reporting Program is not ready for deployment, and we encourage FAS to take additional time to ensure a seamless transition.

ADM appreciates FAS's efforts and welcomes the opportunity to assist in deploying a system that reflects market needs and realities.

Sincerely,

Matthew Hopkins
VP North American Export

A handwritten signature in black ink, appearing to read 'Matt Hopkins', written in a cursive style.