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August 24, 2012

RIN 0551-AA81

Peter W. Burr

Branch Chief, Export Sales Reporting Branch, Import Policies and Export Reporting
Division, Office of Trade Programs, Foreign Agricultural Service
1400 Independence Avenue, SW
Washington, DC 20250-1021

Re: Export Sales Reporting Requirements

Dear Mr. Burr,

USMEF appreciates the opportunity to comment on adding pork to the Export Sales Reporting Requirements.

USMEF is a nonprofit trade association that represents the U.S. beef, pork, and lamb industries through its network of offices and consultants in foreign markets. USMEF's membership encompasses a broad cross-section of American agriculture and includes farmers; meat packers, processors, purveyors and traders; selected agribusinesses with an interest in U.S. meat exports; and other agricultural organizations. In addition to the support USMEF receives from its broad membership base, USMEF also has a close working relationship with the United States Department of Agriculture as a longstanding partner of the Foreign Agricultural Service under the Foreign Market Development and Market Access Programs.

USMEF relies on weekly beef export sales reporting (ESR) as a timely source of information on export shipments, and sales volumes and we provide updates to our members based on the weekly data. USMEF's international offices also utilize the ESR data, and in the high-risk environment of the past several years, ESR data has helped both exporters and importers gain a better understanding of current trade dynamics.

USMEF also provides trade updates to our cattle and hog producing members, including analysis of ESR data for beef, and this helps U.S. farmers and ranchers better understand what is happening from week-to-week on the export side of the business. Other producer-targeted media and analyst reports also publish the ESR data. Since exports are a critical part of the demand equation, producers are better able to make decisions with timely export data. With pork exports accounting for an even larger percent of production than beef, pork producers would benefit from the inclusion of pork in the ESR program.

****USMEF supports adding pork to the list of covered commodities, especially as pork exports account for around one quarter of U.S. pork production and there is a need for more timely information on pork export volumes than is currently available from the monthly (Census) export data, which has a 6-week time lag.**

****Considering that many of our members already provide numerous reports to USDA on a daily basis, USMEF recommends that the reporting be as streamlined as possible.**

****In 2012, there have been significant discrepancies between Census and ESR data for chilled/frozen exports of beef muscle cuts, and this has caused some confusion in**

the industry. USMEF recommends that FAS work with Census to minimize, to the extent possible, differences in the datasets.

**** To minimize confusion from any discrepancies that could arise between the ESR data for pork and the monthly Census data (products covered, data collection methods, etc.), we recommend that FAS provide clear and timely explanations for the reasons behind these differences.**

USMEF has discussed (point d) “ways to minimize the burden of the collection of information on those who are to respond, including through the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology” with our exporting members, and have the following suggestions:

We understand from companies that already are reporting information for the beef ESR program that they currently print a report and enter the numbers from the report onto the USDA website. To minimize the burden of collecting and transferring the data required by the ESR program, exporters would find it helpful if they could transmit the information (for beef and pork) electronically rather than keying the information into the system.

It is also important that USDA/FAS clarify the specific products that are to be reported each week. For example, exporters need clear guidance on where items like feet are included-as muscle cuts or variety meats.

Overall, the availability of data from USDA’s wide range of statistics reporting, including production, prices, inventories, and exports, gives the U.S. an advantage over many of our red meat export competitors, and adding weekly export sales data for pork would enhance that advantage.

We would be happy to answer any questions and thanks again for the opportunity to comment.

Sincerely,

Philip M. Seng
President and CEO
U.S. Meat Export Federation