

Comments identified by docket number 0535-New

David Hancock  
NASS Clearance Officer, U.S. Department of Agriculture  
Room 5336 South Building  
1400 Independence Avenue SW.  
Washington, DC 20250-2024.  
Email: [ombofficer@nass.usda.gov](mailto:ombofficer@nass.usda.gov).

To Whom It May Concern:

The Council on Food, Agricultural, and Resource Economics (C-FARE) is a non-profit organization dedicated to strengthening the national presence of the agricultural economics profession. C-FARE's governing board includes prominent agricultural economists representing a wide range of public and private sector interests.

We are responding to the Federal Register Volume 78, Number 85 (Thursday, May 2, 2013) request for comments. We are writing in support of the National Agricultural Statistics Service (NASS) conducting a new information collection, the 2013 Current Agricultural Industrial Reports (CAIR). We appreciate the opportunity to provide input.

Agricultural economists study the economic forces affecting the food, fiber, bio-industrial, and natural resources industries as well as the related sectors impacting these diverse markets. We work at every level of business, government and education, on issues such as:

- Community and rural development
- Food safety and nutrition
- International trade
- Environment and natural resources
- Agricultural production
- Energy Supply and Demand
- Bio-processes
- Risk and uncertainty
- Consumer and household behavior
- Markets and competition
- Agribusiness and management

C-FARE values the variety of data sources developed by the USDA and other federal agencies. We recommend that USDA-NASS pick up the priority CAIR data. C-FARE supports the request from NASS to reinstate the eight data collection instruments previously used by the U.S. Census Bureau with the additional inclusions that we suggest in this document. We also encourage the continuation of several of the individual reporting categories. These categories provide valuable data on issues like the bio-based supplies of fats and oils and their disposition. In this letter we provide examples of how these necessary data impact crucial segments of the agricultural industry.

**We argue against the aggregation of *fats and oils consumed in soap, paint, animal feeds, methyl esters, resins, and lubricants* into the classification of “Total Inedible Use”.** Aggregating the information in this way would diminish the ability to provide feedstock analyses of these products/uses

at a time when market sensitivities are high. This change would also impact the ability of experts to respond to calls made from both industry and government stakeholders to address and assess the impacts of potential regulatory, legislative, and market transitions. Consolidation of this public information will likely also restrict access to it, potentially providing an unfair advantage to a few market players by concentrating market power among a few groups. Aggregating the data would make it impossible to report on these items individually. However, we do acknowledge that aggregating the data would be better than no data at all, which is the current state-of-affairs. Information on several products (such as glycerin) are key to understanding pathways in bioprocesses. As a result our ability to provide sound information for public and private utilization is greatly hindered. Quests for developing biofuels and bio-industrials are served well by detailed information on the supply and utilization of vital feedstocks. The interaction of multiple feedstocks in diverse markets makes the provision of the most detailed information available vital so that it is possible to capture the largest portion of the markets.

**Glycerin, Tall and Fatty Acid Oils; Inedible Tallow and Yellow Grease; Lecithin produced, Stocks of Beans, and Stocks of Crude Oil; Seeds Received; and Hulls (Produced and Stocks)** should be easily provided from electronic inventory systems on instituted surveys. Furthermore, these items provide a more comprehensive look at the volume and activities of the processing industry and potential market impacts from inventory--demand interactions.

We have provided examples of how these necessary data have impacted a crucial segment of the agricultural industry.

The **Consumption on the Cotton System and Stocks** was the best source for U.S. mill use and cotton stocks. Multiple textile reports were also important to the U.S. cotton industry. The ability to monitor the size of individual segments of the textile industry is extremely important both for policy and business planning objectives. The surveys provide critical information regarding the end-use of cotton and are often used as a benchmark against which U.S. market penetration is calculated in trade-related matters. It is imperative to understand these markets and the components essential to the continued profitability of the industry.

The priority Census Bureau CIR data products have been terminated as of July, 2011. These reports had served as the benchmark for information on such industries as commercial soybean processing. The CIR included surveys across major commercial oilseed processing industry. The Census Bureau cites the availability of manufacturing data from the Annual Survey of Manufactures and the 5-Year Economic Census to mitigate the loss of CIR data products. Unfortunately, the detail included in these surveys is not satisfactory. For example, information about the quantity of commodities—e.g. the amount of soybeans processed and volume of soybean meal and oil produced, cannot be ascertained from the remaining Census materials.

For soybeans, the National Oilseed Processors Association (NOPA) reports were seen as a viable alternative to provide soybean crush information since they included information from roughly 95% of the soybean processing industry. However, as of January 2013, the NOPA reports have been removed from public access and are now available only on a subscription basis. This still does not account for:

- The broader oilseed industry,
- The inventory levels that are crucial with tight domestic and global supplies with volatile markets, and
- The constrained provision of analysis without public information.

If this information is not available for public research and analysis, it may lead to more inefficient market signals and difficulties down the road.

We encourage NASS to work with industry stakeholders in an ongoing and collaborative manner to adjust the survey instruments and utilize categories of suggested data collections that are directly linked to trade industry standards and definitions. Some general terminologies may allow for grouping of data useful to depicting information for an audience seeking broad information. However, the usefulness of the data for industry participants, regulatory authorities, and legislative analyses requires that generally accepted trade standards and definitions guide the data stratification.

Bringing forth more detail from industry participants similar in detail to the former CIR survey instruments should not provide a greater burden to the respondents than had been experienced prior given the inventory technologies in place. We encourage as much diversified detail as possible to be included in the reported data to enhance the meaningful public analyses and information to help guide those requiring data on these critical agricultural processing sectors.

Agricultural producers, input suppliers, financial institutions, processors, commodity traders, government entities, and consumers can all benefit from the provision of the data supplied by the CAIR. However, without this data, analysts are not as well-equipped to provide the information and analyses needed to promote an efficient marketplace.

In summary, C-FARE supports the collection of the data and subsequent public reports. These industries are an important part of the U.S. agricultural economy. Yet, even with the reinstatement of these important reports, they already face large market-related information gaps. We hope that the information we've provided will assist you in making your decision. Thank you again for the opportunity to comment.

Respectfully submitted,

The C-FARE Board of Directors  
900 Second Street, NE  
Suite 205  
Washington, DC 20002