

July 1, 2013

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

Re: National Agricultural Statistics Service
Federal Register Notice of Intent to Seek Approval To Conduct an Information
Collection

Dear Sir,

Louis Dreyfus Commodities LLC, together with its subsidiaries, is a leading merchant, processor, and elevator and warehouse operator of agricultural commodities in the United States. The decision by the U.S. Census Bureau to terminate the Current Industrial Reports in 2011 has left both the government and the industry with inadequate statistics on the processing of agricultural commodities. While NASS currently provides important information on the production of crops and livestock, the proposed information collection is necessary to provide a complete picture of American agriculture which includes how these products are used. This will assist decision-makers and enable the more efficient operation of businesses and government programs.

These numbers are all important for market transparency. We believe this information should be collected and the aggregate results made publicly available for all industry participants to incorporate in their decisions.

We would like to provide the following specific comments on the proposed changes to the previously approved questionnaires:

M311H – Animal and Vegetable Fats and Oils (Warehouse Stocks)

Please continue to compile and report data on glycerin stocks at the warehouses, as this industry is growing with expansion of biodiesel industry.

M311M – Animal and Vegetable Fats and Oils (Consumptions and Stocks)

Please continue to compile and report data on the usage of oils and fats by category, i.e. soap, paint, animal fats, methyl esters, resins, and lubricants. Combining all these categories in one classification "Total inedible use" does not give enough information on which sector is growing and how much fats and oils are being consumed.

M311N – Animal and Vegetable Fats and Oils (Production, Consumption, and Stocks)
Please continue to compile and report data on production, consumption and stocks for all oils and fats including poultry fats consumed in soap, paint, animal feeds, methyl esters, resins, and lubricants. Please do not combine in one category as “Total inedible”.

M311C – Corn (Wet and Dry Mill Producers of Ethanol)
This would be very useful information for the industry as this sector has grown rapidly in the last couple of years. Production of corn oil (according to feed grade, food grade, and industrial grade) should be detailed for both dry- and wet-mills.

M311J- Oilseeds, Beans, and Nuts (Primary Processors)
We suggest that NASS continue to compile all the statistics for the soybean crush industry including lecithin produced, stocks of beans (very important!), stocks of meal, and crude oil stocks. In addition, the statistics on seeds received at mills (and hulls produced) are important and useful. Please compile and report data on canola, peanut, cottonseed crush as well, as it helps to understand supply of other oilseed products.

M313P – Cotton, Manmade Fiber, Staple, and Raw Linters (Consumption and Stocks, and Spindle Activity)

The suggested changes are appropriate as they primarily relate to processes that see little activity. Please be sure to continue to collect and report data on stocks of cotton that split out upland versus extra long staple as there has been no data on stocks of extra long staple cotton since the Census Bureau stopped collecting and reporting this data.

MQ311A – Flour Milling Products (Productions, Stocks and Capacity)
The data is critical to understanding the domestic consumption of wheat. We would suggest the survey include both wheat ground for flour and flour production, so that an implied extraction rate can be calculated. In the final years of the Census MQ311 survey, flour milling extraction rates became more volatile as high prices and consumer preferences (whole wheat flour) led to large movements in extraction rates.

This data serves a further purpose outside of agricultural trade to calculate flour consumption for food expenditure and dietary research.

M311C – Corn (Wet and Dry Mill Producers of Ethanol)
With ethanol production currently accounting for approximately 40% of US corn demand, and US ethanol production currently accounting for approximately 13% of global corn usage, it is vital to better understand this component of usage. Furthermore, in recent years the growth of corn oil extraction has led to another source of plant-based oils for the industrial and food oil markets. Collecting this data will help the industry better understand the production and utilization of ethanol, corn oil, and other products.

In conclusion, we believe that the public's interest will be best served by a collection activity that provides information on the use of agricultural commodities as well as the production data that NASS currently provides.

Sincerely,



David Lyons
Vice President, Government Relations
Louis Dreyfus Commodities LLC