



1400 Crystal Drive, Suite 260, Arlington, VA, 22202
Phone: 202-289-0873 (NGFA); 202-682-4030 (NAEGA)

Via Regulations.gov

June 24, 2021

Mr. Bruce Summers
Administrator
Agricultural Marketing Service
U.S. Department of Agriculture,
1400 Independence Avenue, S.W.
Rm. 2043-S, Mail Stop 3614
Washington, DC 20250-3601

RE: Docket No. AMS-FGIS-21-0010-United States Standard for Sorghum

Dear Administrator Summers:

The National Grain and Feed Association (NGFA) and the North American Export Grain Association (NAEGA) appreciate the opportunity to submit this joint statement in response to the Agricultural Marketing Service's (AMS) request for information on the U.S. Standards for Sorghum published in the March 26, 2021 edition of the *Federal Register*.

NGFA, established in 1896, comprises more than 1,050 member companies that operate more than 7,000 facilities and handle more than 75 percent of the U.S. grain and oilseed crop. NGFA's membership encompasses all sectors of the industry, including country, terminal, and export grain elevators; commercial feed and feed ingredient manufacturers; biofuels producers; cash grain and feed merchants; end-users of grain and grain products, including processors, flour millers, and livestock and poultry integrators; commodity futures brokers and commission merchants; and allied industries. The NGFA also has strategic alliances with NAEGA and the Pet Food Institute. In addition, affiliated with the NGFA are 33 state and regional grain and feed trade associations.

NAEGA, a not-for-profit trade association established in 1912, consists of private and publicly owned companies and farmer-owned cooperatives that are involved in and provide services to the agri-bulk products international trading industry. NAEGA members are exporters of and serve the vast majority of all U.S. grain and oilseeds in international markets. NAEGA's mission is to promote and sustain the development of commercial export. Through a reliance on

member action and support, NAEGA acts to accomplish its mission in markets throughout the world.

U.S. grain standards play an important role in marketing by facilitating price discovery and value management. In addition, they provide consistent indicators of grain quality that have widespread acceptance in both the U.S. and world markets. In the past, modification of official U.S. grain standards and the grading practices of the Federal Grain Inspection Service have been implemented to accommodate variety, class, logistics and production changes. Before modification to existing standards are made, they must be carefully and comprehensively evaluated for two good reasons: 1) to make certain that such changes are truly necessary to facilitate the marketing of U.S. grains, oilseeds, and grain products; and 2) to maintain reasonable stability in identification of grain in order to support the determination of market value. The fact that our domestic and international customers, as well as farmers and grain marketers, can count on well-known, widely recognized and properly informed grade standards tends to draw customers to the U.S. grain supply, and reduces trading risks for market participants.

Changes to the U.S. grain standards create confusion and uncertainty for market participants and should be avoided unless they can be shown to demonstrably improve or correct significant flaws in the existing standards. Unless changes are justified based upon these criteria, and provide for proper advance notification and transition, NGFA and NAEGA believe they can be counterproductive – creating a lack of understanding, more uncertainty and increased risk among domestic and international buyers, which may tend to encourage some customers to seek out alternative suppliers in other countries whose grading standards are more stable and predictable.

Based upon these principles, the NGFA and NAEGA believe the current U.S. Standards for Sorghum and grading practices are meeting their stated purpose and should be retained without change. Further, we support the comments submitted by the National Sorghum Producers regarding further research and evaluation by the AMS on sorghum classes, sorghum odor and standardized unit of measurement.

We appreciate AMS' consideration of our comments and would be pleased to respond to any questions you may have.

Sincerely,



Michael Seyfert
President and Chief Executive Officer
National Grain and Feed Association



Gary C. Martin
President and Chief Executive Officer
North American Export Grain Association