

March 28, 2011

David Hancock
NASS Clearance Officer
U.S. Department of Agriculture
Room 5336 South Building
1400 Independence Avenue, SW
Washington, D.C. 20250-2024

ATTN: Docket No. 0535-0247

Re: Comments of the Renewable Fuels Association in response to USDA-NASS Notice of Intent to Reinstate a Previously Approved Information Collection. 76 Fed. Reg. 4,862 (January 27, 2011).

Dear Mr. Hancock,

The Renewable Fuels Association (RFA) is pleased to submit these comments regarding the National Agricultural Statistics Service's (NASS) notice of intent to conduct a "Distiller's By-products Survey" to measure the use of distillers grains and other co-products by livestock and poultry operators.

RFA is the leading trade association for America's ethanol industry. Its mission is to advance the development, production, and use of fuel ethanol and co-products by strengthening America's ethanol industry and raising awareness about the benefits of renewable fuels. Founded in 1981, RFA represents the U.S. ethanol industry and serves as the premier meeting ground for industry leaders and supporters. RFA's 300-plus members are working to help America become cleaner, safer, more energy secure and more economically vibrant.

In general, the RFA strongly supports NASS' efforts to conduct a large-scale survey to measure livestock and poultry producers' use of distillers grains and other corn processing co-products. As ethanol production has expanded dramatically in recent years, so too has the production of distillers grains (DG) and other grain ethanol feed co-products.¹ Though production of these ethanol co-products is not surveyed by USDA, it is widely estimated that more than 40 million

¹ Use of the term "distillers grains" or the abbreviated form ("DG") in this comment letter includes all forms of distillers grains (i.e., DDG, DDGS, DWG, "modified" DWG, etc.)

tons of DG, corn gluten feed, and other co-products will be produced in the 2010-11 corn marketing year.

Unfortunately, the economic, nutritional, and environmental benefits of feeding these co-products to livestock and poultry at commercial scale are not well understood because there is generally a lack of credible data and information regarding commercial use of these products. NASS' first co-products survey in 2006 and subsequent report in 2007 was useful in identifying the breadth of co-products usage, what types of co-products were being fed, and the characteristics of those co-products.² However, the 2007 report offered just a snapshot in time and more regular data collection is necessary to identify trends and changes over time. Accordingly, the upcoming NASS survey will play a critical role in identifying how co-product feeding practices have changed since 2006. More generally, the upcoming survey will improve and update the collective understanding of how and why DG and other co-products are being used by commercial livestock and poultry producers. Moving forward, we encourage NASS to conduct this survey every three years, or at the very least, every five years.

Specific Comments

- **The survey should include questions asking how DG and other co-products fit into the livestock/poultry producer's typical ration formulation program.** Among the most important informational needs related to DG and other feed co-products is data on how feed co-products are actually fitting in to commercial livestock and poultry rations. Most information available today regarding DG feeding rates is based on university feeding trials and/or other experimental applications. The 2006 NASS survey included questions on "inclusion percentage" and "average amount fed per animal." Each species-specific survey instrument for the 2011 survey should again include questions asking what percent of the producer's standard ration is typically comprised of DG or other biofuel co-products. Obviously, ration formulation depends largely on the relative costs of competing feed ingredients, and ration formulations can change rapidly depending on market conditions. Still, information about average ration formulation during calendar year 2011 would be extremely useful.

Further, the 2011 survey instrument for each species should ask what feed ingredients are most commonly displaced from the ration as a result of including DG or other feed co-products, as well as the mass displacement rate. For example, a question could be worded to ask: "What feed ingredients, by mass, are replaced by 1 lb. of DG in the average ration?"

² NASS. June 29, 2007. Ethanol Co-Products Used for Livestock Feed. Available at: <http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1756>

- **NASS should ensure new distillers co-products are included in the survey and refer to such co-products by their colloquial names.** The 2006 survey included a question asking what type(s) of distillers co-products were being fed by the respondent. For the upcoming survey, we recommend maintaining the following co-products as options for selection by the respondent: condensed distillers solubles (CDS); distillers dried grains, no solubles (DDG); distillers dried grains with solubles (DDGS); corn gluten feed (CGF); and distillers wet grains (25-40% solids). We recommend replacing “distillers wet grains (over 40% solids)” with “modified distillers wet grains (over 40% solids)” to better reflect current industry jargon. We also recommend eliminating the options of “combination of co-products” and “complete commercial feeds” as those options offer little value in determining what specific types of co-products are being fed.


Further, we recommend eliminating the option for “co-products from new processes” and replacing it with the following options: “de-oiled/de-fatted DDG or DDGS” and “high-protein DDG or DDGS.” “De-oiled or de-fatted DDG or DDGS” is the co-product obtained after some portion of the crude fat/crude oil is extracted from stillage on the *back end* of the dry mill ethanol process. The resulting co-products generally contain 33-37% crude protein. “High Protein DDG or DDGS” is the co-product obtained after grain is processed using a fractionation technology on the *front end* of the dry mill ethanol process. In this process, bran and germ are removed from the corn, resulting in endosperm that is used for ethanol production. The co-product that results typically contains 40-45% crude protein. These co-products are also sometimes referred to as “de-germed” DDG or DDGS. Finally, we recommend adding “corn germ meal” as an option for selection by respondents.

- **RFA supports NASS’ plans to provide state-level data when possible.** NASS has indicated that it intends to report data collected via the upcoming survey on a state-level basis when possible. NASS also intends to survey producers in all states except Hawaii and Alaska. Offering this level of detail would be very useful.
- **The survey should again ask producers to rate co-product characteristics.** One of the most useful features of the 2006 survey and subsequent 2007 report was the information regarding the respondents’ Likert scale ratings of co-product characteristics. We encourage NASS to again include these questions on the 2012 survey.
- **The survey should again include questions asking about the producer’s primary reasons for not feeding DG and other co-products.** The 2006 survey asked respondents to identify primary reasons for not feeding DG or other co-products. This information was very useful to stakeholders in the biofuels, feed and livestock industries in identifying educational needs and knowledge gaps. In addition to the

factors listed as options in the 2006 survey instrument, we recommend adding “perception of mycotoxin issues” to the list of possible barriers to co-product use.

Thank you for the opportunity to provide comment. We look forward to the successful completion of the 2011 survey and believe the data and information collected will be invaluable to industry stakeholders. Please do not hesitate to contact us with any questions or comments regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "Geoff Cooper". The signature is written in a cursive, flowing style.

Geoff Cooper

Vice President, Research & Analysis

Cc:

Jim Johnson, NASS

Nick Pallotta, NASS