RENEWABLE FUELS ASSOCIATION

April 9, 2026

Attention: Docket No. ERS-2026-0001

Dr. Scott H. Hutchins
Under Secretary, Research, Education, and Economics
U.S. Department of Agriculture
1400 Independence Avenue SW
Mail Stop 1800
Washington, DC 20250-1800

Via: www.regulations.gov

Re: Comments on *Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture* (91 Fed. Reg. 8403; February 23, 2026).

Dear Dr. Hutchins:

The Renewable Fuels Association (RFA) appreciates the opportunity to submit these comments in response to the *Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture* (91 Fed. Reg. 8403; February 23, 2026). The RFA is the leading trade association for America's ethanol industry. Our mission is to drive growth in sustainable renewable fuels and bioproducts for a better future.

The data published by USDA are often considered the "gold standard" among international statistical agencies for agriculture. RFA strongly agrees with this description.

USDA data are critical to the efficient functioning of U.S. and global commodities markets, and the department plays a vital role in ensuring that objective, fact-based information is available to policymakers. Budget and staffing levels should be maintained at a level sufficient to ensure that USDA is able to continue providing key statistical data and information needed by market participants and policymakers, even if other USDA priorities are re-examined. At the same time, areas of coverage should evolve over time, and process improvements should be made periodically for data collection and dissemination.

The following are RFA's comments on specific questions from the RFI.

(1) Which NASS or ERS data (e.g., releases, reports, datasets) are most valuable to your work, and why?

RFA, our member companies, and our supply chain partners make use of a number of USDA reports and datasets. The ones that are regularly used by RFA are indicated below, along with brief explanations of how they are used.

NASS:

Crop Production, Prospective Plantings, Acreage, Crop Progress, Grain Stocks, and Agricultural Prices: Corn and sorghum are the primary feedstocks for ethanol production. For futures and cash markets to function efficiently and for ethanol producers to make informed decisions about procurement, it is critical to have accurate, timely estimates and forecasts of crop acreage, production, stocks, and prices.

Grain Crushings and Co-Products Production: This report provides extensive data on ethanol biorefineries' feedstock usage and coproduct output.

Agricultural Chemical Use Program and county-level acreage and yield estimates: Estimates of agricultural chemical usage are incorporated into the Greenhouse gases, Regulated Emissions, and Energy use in Technologies (GREET) model, which is used for the federal section 45Z Clean Fuel Production Credit and for other U.S. and international biofuel programs. Additionally, farm input usage and crop yields are reflected in the USDA Feedstock Carbon Intensity Calculator (FD-CIC). As indicated in the 45Z notice of proposed rulemaking released in February, "Following publication of the final version of USDA FD-CIC, the Treasury Department and the IRS anticipate that a section 45Z-specific version…will be included as an input to the DOE's 45ZCF-GREET model…used for calculating carbon intensity adjustments under section 45Z."[1] Finally, county estimates are useful in determining not only feedstock supply/demand conditions near individual biorefineries but also broader trends in land use.

Census of Agriculture: The Census provides comprehensive data on the operational and economic structure of American farms and ranches. It is also an important resource for long-term data on land use.

Livestock and poultry market reports and the Fats and Oils (oilseed crushings) report: These are useful since they provide data on the markets into which distillers grains and distillers corn oil—key coproducts of ethanol processing—are sold.

ERS:

Feed Grains Yearbook Tables: The tables provide extensive historical data on the supply and demand for corn and sorghum.

U.S. Bioenergy Statistics: This is a compilation of key data for markets related to biofuels. ERS "combines data from the U.S. Department of Energy's Energy Information

[1] 91 Fed. Reg. 5172 (February 4, 2026)

Administration and USDA agricultural data sources…to create a value-added product whose statistics highlight the biofuel-based demand for agricultural feedstocks."[2]

Agricultural Trade Multipliers: RFA uses these specialized trade multipliers in our annual report on the contribution of the ethanol industry to the U.S. economy.[3]

Food Dollar: This series estimates the farm share of the food dollar over time, as well as the shares accounted for by other supply chain segments, which is helpful in assessing the drivers of food price inflation.

Commodity Costs and Returns and Farm Income and Wealth Statistics: These provide important data on the economics of production of corn and other crops and the financial health of crop producers.

Major Land Uses (MLU): This is one of the key data sets on land use.

(9) Which ERS or OCE-WAOB research or analytical products (e.g., farm income, situation and outlook reports, ERS research reports, WASDE) are most valuable to your work, and how do you use them?

OCE-WAOB:

World Agricultural Supply and Demand Estimates: The WASDE is an indispensable report providing estimates and forecasts of the supply, demand, and prices of corn and other commodities at the U.S. and world levels.

Baseline projections (e.g., USDA Agricultural Projections to 2035): USDA's agricultural projections for the next decade provide one of the few extensive, publicly available long-term forecasts of the agricultural sector.

ERS:

Feed Outlook: This report provides an update and review of the U.S. and international markets for corn and sorghum.

Livestock, Dairy, and Poultry Outlook: This report provides an update and review of the markets into which distillers grains and other ethanol coproducts are sold.

Ad hoc reports: A number of these reports address topics of interest to biofuel stakeholders. Recent examples include Status and Trends of USDA Conservation Programs and Persistence of Cover Crop Use in Crop Production in the United States.

It should be noted that some of these reports and datasets, along with others published by USDA, are used by the Environmental Protection Agency in its process for establishing the volume obligations for the Renewable Fuel Standard, the main federal program providing market access for American-made biofuels. This is reflected in the Regulatory

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[2] https://www.ers.usda.gov/data-products/us-bioenergy-statistics

[3] https://ethanolrfa.org/file/3046/Economic%20Contribution%20of%20the%20US%20Ethanol%20Industry%20in%202025.pdf

Impact Analysis that EPA released when it issued the 2026 and 2027 RFS standards last week.[4]

(11) When using ERS or OCE-WAOB forecasts or research, are you more likely to use raw data files, written analysis, or both? If you use one product type more than another, why?

RFA frequently uses both data files and written analysis. Except for reports such as the WASDE, in which it is helpful to have an explanation of the current estimates and forecasts as well as changes since the previous version, we tend to use USDA data more than written reports since we conduct our own analyses and otherwise utilize the data for specific purposes.

(14) How do you currently access ERS, NASS, or OCE-WAOB data (e.g., Quick Stats, website, Application Programming Interfaces)? What challenges do you face when accessing data or research? What improvements would you suggest?

We access data from NASS largely through Quick Stats, and we obtain data from ERS and OCE-WAOB mainly by downloading Excel files from their websites. Quick Stats is useful, though its interface could be enhanced to improve usability. ERS and OCE should make data available through a platform that at a minimum has similar functionality.

Although not addressed in the RFI, it is worth noting that RFA also frequently uses data from the Bioenergy Market News Reports published by the Agricultural Marketing Service. AMS has a searchable Market News Database, but the interface is difficult to use.

It is often necessary to rearrange or restructure data contained in files downloaded from USDA prior to conducting analysis with it or otherwise utilizing it in Excel, though data accessed through Quick Stats generally require less preparation.

It would be highly preferable for USDA to develop a single, up-to-date, user-friendly interface or tool to allow access to and querying of economic data (i.e., supply, demand, and price data) consolidated from across NASS, ERS, OCE, and AMS. In a subsequent phase of work, this could be expanded to include economic data from other agencies that publish such data, such as the Foreign Agricultural Service (trade data) and Farm Service Agency.

(15) What tools or formats would improve usability of ERS, NASS, and OCE-WAOB products (e.g., dashboards, machine-readable files, visualizations, downloadable tables)?

As noted above, it would be highly preferable for USDA to develop a single, up-to-date, user-friendly interface or tool to allow access to and querying of consolidated economic data

[4] U.S. EPA. "Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes. Regulatory Impact Analysis." (April 3, 2026) https://www.epa.gov/system/files/documents/2026-03/420r26011.pdf

from across agencies. In general, RFA would recommend that USDA allocate its resources to make data more accessible rather than creating more extensive visualizations.

(18) How do you assess the credibility and relevance of ERS, NASS, and OCE-WAOB data and analytical products compared to other providers (e.g., land-grant or private universities, commercial vendors)?

In general, the data and analytical products from ERS, NASS, and OCE-WAOB are highly credible. As noted, reports such as Crop Production, Prospective Plantings, and Acreage are critical to the efficient functioning of markets, and private companies and universities are typically unable or unwilling to expend the resources to conduct the extensive surveys needed to support such estimates. At the same time, new technologies and means of communication emerge over time, and USDA should consider how to integrate them into its processes to ensure that sample sizes are sufficient and that useful data are being incorporated into its statistics.

It is not clear how ERS chooses the topics for ad hoc reports, and it might be worthwhile to engage with industry as it considers which analyses to conduct.

(19) Are there other data or analytical products or reports produced by other parts of USDA that you consider highly valuable, duplicative, or redundant?

RFA uses Bioenergy Market News Reports, other commodity price data, and transportation statistics published by AMS.

(20) What is the best way for ERS, NASS, and OCE-WAOB to receive ongoing feedback on its data and analysis?

USDA should continue to host its Data Users' Meeting at least once a year. Soliciting feedback through requests for information similar to the current one every few years would also be beneficial. If USDA were to consider modifying or discontinuing the publication of longstanding datasets and reports, it should engage with the affected stakeholders first.

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On behalf of RFA, thank you again for the opportunity to submit these comments in response to USDA’s request for information. We would be available for further discussion of USDA’s data and analyses if it would be helpful.

Sincerely,

Scott Richman
Chief Economist