



April 28, 2023

Mr. Arthur Neal
Deputy Administrator
Agricultural Marketing Service
United States Department of Agriculture
1400 Independence Avenue Southwest
Washington, D.C. 20250

Submitted via Regulations.gov

Re: Docket No. AMS-AMS-22-0083: United States Standards for Soybeans

Dear Deputy Administrator Neal,

On behalf of the American Soybean Association (ASA), thank you for providing the opportunity to comment on this proposed rule regarding changes to the United States Standard for Soybeans. ASA has been the leader in policy and trade advocacy for U.S. soybean farmers since 1920, advocating for America's soy producers on domestic and international policy issues for more than 100 years. Our organization has 26 affiliated state associations representing 30 major soybean producing states and over half a million soybean farmers.

ASA appreciates USDA publishing this much-needed proposed rule to remove Soybeans of Other Color (SBOC) as a grade-determining factor under the U.S. Standard for Soybeans. As we and others in the soybean industry have shared with USDA over the past eighteen months, use of SBOC as a grade-determining factor is jeopardizing the intent for U.S. official grade-determining factors and factor limits to reflect the levels of soundness and purity that are consistent with end-use performance goals of soybean customers.

As AMS has noted, historically, SBOC levels have been low, rarely impacting the grade of soybeans. However, for the past two years, the soybean industry has experienced an increased presence of SBOC. This increase had made it more difficult for our partners in the export community to meet contract grade requirements due to the inclusion of SBOC in current grain standards.

It is also important to note that our major competitors in other soybean exporting countries do not include SBOC as part of their domestic grading standards. This has the potential to harm U.S. soybeans in the international marketplace.

Furthermore, a Federal Grain Inspection Service (FGIS) study of the functionality of protein and oil content of soybean samples containing amounts of SBOC found no significant differences in the protein or oil content as compared to samples not containing SBOC¹.

ASA urges USDA in the strongest terms to move forward with this proposed rule to remove SBOC before the 2023-2024 marketing year. This ongoing issue has caused uncertainty in the marketplace, and we are

¹ <https://www.ams.usda.gov/sites/default/files/media/FGISSBOCStudy.pdf>

appreciative for USDA's partnership in removing this hinderance in the marketplace on behalf of U.S. soybean growers. We stand willing and ready to work with you as the rule moves forward.

Sincerely,

A handwritten signature in black ink that reads "Daryl L. Cates". The signature is written in a cursive style with a long horizontal flourish at the end.

Daryl Cates
President
American Soybean Association