



National Grain and Feed
Association



North American Export
Grain Association

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January 31, 2012

L. Daniel Mullaney
Assistant U.S. Trade Representative for Europe and the Middle East
Office of the U.S. Trade Representative
600 17th Street N.W.
Washington, D.C., 20508

*Re: Statement Regarding the U.S.-EU High-Level Working Group on Jobs and Growth
Docket number USTR-2012-0001*

Dear Mr. Mullaney,

The North American Export Grain Association (NAEGA) and National Grain and Feed Association (NGFA) appreciate the opportunity to submit this joint statement concerning the request for comments on the establishment of the U.S.-EU High Level Working Group on Jobs and Growth.

A not for profit trade association, NAEGA was established in 1912 and includes membership from private and publicly owned companies and farmer-owned cooperatives that are involved in and provide services to the bulk grain and oilseed exporting industry. NAEGA member's exports from the U.S. total approximately \$70 billion, well over 60 percent of total U.S. agricultural exports. NAEGA's mission is to promote and sustain the development of commercial export of grains and oilseeds, as well as their primary products. Through a reliance on member action and support, NAEGA acts to accomplish this mission from its office in Washington, D.C., and in markets throughout the world.

Established in 1896, the NGFA is comprised of more than 1,050 member companies involved in grain-handling, feed manufacturing, grain milling and processing, and grain exporting. NGFA-member firms operate in excess of 7,000 facilities and handle more than 70 percent of the U.S. grain and oilseed crop.

NAEGA and NGFA commend the initiative to form the U.S.-EU High-Level Working Group on Jobs and Growth. In particular, we support the effort to identify policies and measures to

increase U.S.-EU trade and investment to support mutually beneficial job creation, economic growth and international competitiveness.

From the perspective of the major U.S. agricultural sectors in which our member companies are involved, the NAEGA and NGFA believe that the following two initiatives should be of primary importance for the Working Group:

1. Reducing and eliminating the inconsistencies between the U.S. and EU regulation of crop biotechnology that restrict or prevent trade in grains, oilseeds, and food and feed products manufactured therefrom. For example the current EU “technical solution” with respect to the low-level presence of grains, oilseeds and grain-based products derived from modern biotechnology that have been approved for use in food and feed in the country of export, but not yet in the EU, places an impractical restriction on U.S. exports of grains, oilseeds and products thereof to the EU.
2. Completing by August 1, 2012 a bilateral agreement as stipulated in the EU Renewable Energy Directive (RED). We believe such an agreement should recognize that the EU’s RED-sustainability requirements are achieved through the production and marketing of grain and oilseed crops that have been produced under long-standing compliance with U.S. conservation program requirements. Further, we believe the agreement ultimately should result in a determination that U.S. soybeans and other commodities that are imported to the EU for biofuels and biofuel feedstock do not require additional certification.

NAEGA and NGFA look forward to supporting a successful outcome of the U.S-EU High-Level Working Group on Jobs and Growth. We encourage the Working Group to consider these joint recommendations fully, and stand ready to respond to any questions or further requests for information.

Sincerely,



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



Hal Reed
Chairman
National Grain and Feed Association