



The Link Between Grain and Goodness

April 7, 2026

The Honorable  
Scott H. Hutchins  
Under Secretary for Research, Education, and Economics  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

*RE: Docket No: ERS-2026-0001 Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture*

Dear Under Secretary Hutchins:

In response to the Request for Information (RFI) released by USDA on February 23 in the [Federal Register](#), the North American Millers Association (NAMA) has specific interest in maintaining the National Agricultural Statistics Service (NASS) Flour Milling Products report and supports the continued maintenance of the NASS Crop Progress Report. More detailed information is below.

NAMA represents millers of wheat, corn, oats, and rye in the U.S. and Canada. Our 36 milling members take raw grain and, through grinding and crushing, create flour and other products that are used to make favorite foods, such as bread, cereals, pasta, tortillas, cookies, cakes, and snack foods. With over 150 mills across 30 plus states, Puerto Rico, and Canada, our members process approximately fifty percent of the U.S. wheat crop annually. We are proud to be the indispensable link between grain and healthy and delicious products that have sustained and enriched people's lives for centuries.

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

The quarterly [Flour Milling Products](#) provides essential data for the U.S. milling industry. The report is part of the Current Agricultural Industrial Reports (CAIR) program and data is obtained by surveying mills. The flour production, wheat used for flour, and milling capacity data that appear in *Flour Milling Products* is especially important in helping millers make decisions that ensure cost-effective, efficient, stable supply chains align with the demands of our customers and ultimately consumers in an ever-changing environment. The data helps the entire wheat flour value chain understand the overall demand for wheat and flour and the total milling capacity of the industry. The state and regional summaries are also helpful to show how demographic and industry shifts within the United States are evolving over time.

There is no other report that is like the *Flour Milling Products* report and keeping it within the public domain is critical. The data in the report supports industry decision-making in a range of areas including purchases of raw materials and sales of flour and millfeed, logistics and

purchases of equipment. More broadly it details the overall strength of the industry and supports acquisitions and mergers. The *Flour Milling Products* report also feeds into USDA Economic Research Service sector reports on wheat which further enumerate domestic and export demand including the annual “disappearance” of flour or consumption by U.S. consumers.

The *NASS Crop Progress Report* which is published weekly during the growing season is also critically important to the milling industry. The reporting on planting and harvesting progress and overall condition of crops is a key driver for market intelligence and provides information for the milling industry as they plan for the new crop. The overall size and quality of the crop is crucial to business planning for the milling industry.

***Question 6. Are there NASS or ERS data products, data sets, and other relevant information that are duplicative, outdated, or underutilized? What improvements, changes or consolidations could be made (e.g., more timely, different data collection methods)?***

For the *Flour Milling Products* report specifically, more timely updates are needed to ensure accuracy. This includes updates to survey recipient lists and updating changes in the capacity, operational status and location of mills. NAMA is ready and able to provide this information to USDA NASS on a regular basis.

***Question 7. Do you use non-USDA data to supplement data elements or variables of interest that are missing from NASS or ERS products? If yes, please specify which data sets you supplement and why. If yes, please specify why you are using non-USDA data in conjunction with USDA data.***

NAMA members cooperate with USDA, the U.S. Census Bureau, and the Department of Labor to support the broader effort by the U.S. Government to gather economic data. These include data provided to calculate the Consumer Price Index, Producer Price Index, and monthly employment statistics. This data provides an overall picture of the industry and our markets and informs Congressional and Executive Branch leadership on their policy-related decisions.

***Question 13. How could ERS and OCE–WAOB improve transparency of the data sources, assumptions, methodology, or models used in economic forecasts?***

As these reports rely on survey responses, improving and re-engaging respondents is critical to the success and accuracy of data.

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

Regarding USDA/NASS data, NAMA's use of the data for *Flour Milling Products* is limited by the difficulty of using the NASS Quick Stats time series feature. Currently Quick Stats

generates tables with April as the beginning of the year, as the cut and paste from a download of flour production shows:

2025 APR THRU JUN  
2025 JAN THRU MAR  
2025 JUL THRU SEP  
2025 OCT THRU DEC

The default setting should be the most recent report--October-December 2025--at the top, with the rest of the year's quarters in a proper time series, with July to September 2025 next. To rearrange the data into a proper time series will help NAMA save time and expense and increase data use.

***Question 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)?***

The U.S. milling industry relies on the actionable, accurate, and unbiased data gathered by the professionals at USDA that is immune to conflicts of interest and publicly available. We urge you to continue investments into this mission area to maintain the highest level of accuracy and usability of your reports.

Sincerely,



Jane DeMarchi  
President