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Docket No. USTR-2016-0007
Office of the United States Trade Representative
Trade Policy Staff Committee
600 17th Street NW
Washington, DC 20208

Re: Comments Regarding the 2016 National Trade Estimate Report on Foreign Trade Barriers

USA Rice, located at 2101 Wilson Blvd., Suite 610, Arlington, VA 22201, is the global advocate for all segments of the U.S. rice industry with a mission to promote and protect the interests of producers, millers, merchants and allied businesses. USA Rice members are active in all major rice-producing states: Arkansas, California, Florida, Louisiana, Mississippi, Missouri and Texas. The USA Rice Farmers, USA Rice Council, USA Rice Merchants' Association and the USA Rice Millers' Association are members of the USA Rice Federation.

USA Rice submits the following in response to the Federal Register notice of July 19, 2016, requesting comments to compile the National Trade Estimate Report. This statement covers all rice listed under chapter 1006 of the Harmonized Tariff System.

EUROPEAN UNION

Import Policies

The EU has traditionally been a major export destination for U.S. rice, particularly long grain varieties from the mid-South. However, U.S. access is sharply constrained by EU import policies designed to protect the brown rice milling industry in northern Europe; to provide specific tariff concessions on rice to certain countries; and to provide duty free access to least developed countries. These policy priorities leave U.S. access restricted to brown rice because of prohibitive import duties on milled rice. Additionally, the United States does benefit from a small tariff rate quota of fully milled rice granted as a concession due to EU expansion in 1995.

Below are tables showing U.S. rice exports to the EU-28 by quantity and value for the period 2005-2015 and EU import duties by tariff line.

U.S. Rice Exports to the EU

CY	Value (\$Million)	Quantity (MT)
2005	87	306,344
2006	67	207,194
2007	44	98,006
2008	68	103,296
2009	65	82,715
2010	47	71,405
2011	59	88,309
2012	47	62,661
2013	41	55,025
2014	41	48,879
2015	43	52,470

Source: Dept. of Commerce, U.S. Census Bureau, Foreign Trade Statistics

EU: WTO Bound Rates and Applied Duties on Rice

Product	HTS	Bound Rate	Applied Rate 1/
Paddy Rice	1006.1	€211 MT	€211 MT
Brown Rice	1006.2	€65 MT	€30-€65 MT*
Milled Rice	1006.3	€175 MT	€145-€175 MT
Broken Rice	1006.4	€128 MT	€65 MT

1/ Zero duty on rice from least developed countries (under Everything But Arms concession).

* Exports of brown Basmati rice from India and Pakistan have zero duty treatment.

EU Rice Import Policies. EU rice import policy is complicated, with border protection varying significantly across rice products and between imports regulated by multilateral agreements and those covered by preferential tariff schemes. The EU has multiple import regimes for rice consisting of tariff rate quotas (TRQ), variable applied duties, and country-specific concessions. The current regimes as a whole severely distort the import market, raise serious questions about compliance with the EU's obligations to the World Trade Organization (WTO), and are detrimental to U.S. export interests. USA Rice has long advocated for zero EU import duties on all types and forms of U.S. rice as an outcome of the Trans-Atlantic trade and Investment Partnership negotiations.

*Below is a summary of the EU's rice import regimes as understood by USA Rice. **Highlighted headers indicate applicability to U.S. rice and/or U.S. benefit.***

White rice regime. *The white rice (fully milled) import duty is bound at €175/mt, but the applied duty is determined twice within a marketing year (Sept-Aug) – on September 1 and March 1 – based on imports*

in the preceding 12 and 6 month reference period, respectively. Based on the level of imports in the reference period relative to a predetermined reference level, the applied rate is either €175/mt or €145/mt. The current duty is €175.

Brown rice regime. *Brown rice exporters, including the United States, are subject to a complex variable levy system that provides for one of three applied duties -- €30, €42.5, or €60/mt – depending on brown rice imports in a preceding 6- or 12-month period. Duties are reset every six months, and the current duty is €30/mt. The current import regime for brown rice dates to 2005, and USA Rice believes this regime should be replaced by a straight duty of zero.*

Broken rice regime. *The bound EU duty on broken rice is €128/mt, but the applied, or current rate, is €65/mt. The EU also has five country-specific TRQs (including one for the United States) and a TRQ for all origins. Under these TRQs, the duty is 30.77% less than the applied duty. The U.S. TRQ equals 9,000 mt.*

Basmati Rice regime. *Specified varieties of basmati rice –in brown form – from India and Pakistan enter the EU at zero duty. There is no quantity cap to this concession.*

Everything But Arms Concession. *All agricultural products, including rice, enter duty-free from a list of least developed countries. There is no quantity restriction on this concession. EBA-eligible rice producing countries, particularly Cambodia and Myanmar, have established and growing markets in the EU.*

TRQ for EU Enlargement--Sweden, Finland and Austria (1995). *Following negotiations with the United States, Australia, and Thailand, the EU established two global calendar-year TRQs: one for 63,000 metric tons of milled rice and another for 20,000 tons of brown rice. The U.S. share of the milled rice TRQ, is 38,721 tons at a zero duty. The U.S. share of brown rice TRQ, is 7,642 tons at a duty of €88/mt. The brown rice concession is currently effectively worthless because the bound, or maximum, EU duty on brown rice is €65/mt.*

TRQ for Enlargement—to EU-27. *Five country-specific TRQs and two TRQs for all origins were established for milled rice for a total of 81,049 mt with a zero in-quota duty. The U.S. share is 2,388 mt.*

ACP Countries with Economic Partnership Agreements (EPA). *EPAs between the EU and Africa, Caribbean, and Pacific (ACP) countries provide for duty-free-and quota-free access to the EU market for all types of rice originating in ACP countries.*

TRQs for Egypt. *As part of an Association Agreement, the EU provides a zero-duty TRQ for 23,155 mt of brown rice on an annual basis. Egypt also receives a milled-rice TRQ of 81,149 mt and a TRQ for broken rice of 92,742 mt, both at zero duty.*

TRQ for Bangladesh. *A brown-rice equivalent TRQ of 4,000 mt, excluding paddy rice, at within quota duties of at least 50% less than applied duties based on type and form of rice imported.*

Peru Quota. *A zero duty tariff rate quota of 40,800 mt in 2015, increasing annually by 3,400 mt.*

Central American Quota. *A tariff rate quota of 20,000 mt annually of long grain milled or long grain brown rice in 2015, increasing annually by 1,000 mt.*

TRQ for all WTO members. There is an annual brown rice TRQ for 1,634 mt with an in-quota duty of 15%.

EU Rice TRQ's by Type of Rice and Origin (metric tons)

Origin	Paddy	Husked	Milled	Broken	All Rice
Egypt		23,185	81,149	92,742	
Thailand			26,968	52,000	
United States		7,642	41,109	9,000	
Peru					40,800
Central American Countries					22,000
Australia			1,019	16,000	
Guyana				11,000	
Bangladesh					1/ 4,000
India			1,769		
Pakistan			1,595		
All Countries	7	1,634	25,516	32,788	
All Countries except Thailand, US, Pakistan, India			3,453		
All Countries except Thailand, US, Australia, Guyana				12,000	
All Countries except Thailand, US, Australia			1,805		
Total	7	32,461	184,383	225,530	66,800

Note: Quantities are on a product-weight basis except as noted. Most TRQs enter duty free, but some enter at a reduced-duty level. 1/Brown rice equivalent.

Sources: Federation of European Rice Millers, *Official Journal* of the European Union, and *The EU Rice Regulatory Regime*, European Commission, Directorate General for Agricultural and Rural Development, February 2015.

USA Rice calculates that in marketing year 2015/16, 68 percent of EU rice imports were duty free under current tariff rate quotas and the above concessions (see below).

EU Duty Free & All Rice Import Regimes: MY 2015/16 (thousand metric tons, milled eq.)

TRQ Utilized	Basmati Rice	EBA Countries	ACP Countries	Total Duty Free Imports	All Imports	% Duty Free of All Imports
95,480	300,080	368,280	163,680	927,520	1,364,000	68.0

Notes: European Commission, Committee for the Common Organisation of Agricultural Markets, *Rice Market*, 09/29/2016

The Margin of Preference. The present EU white, brown, and broken rice duty regimes replaced an EU trade concession called the margin of preference (MOP) in 2005. Under WTO rules, the EU was required to put in place a duty regime no less favorable to imports when it withdrew the MOP. Because of uncertainty over U.S. market access, the United States reserved its WTO rights to challenge the new brown rice regime if access was found to be less than what would have existed under the MOP.

USA Rice calculates that the duty on U.S. brown rice would be zero today if the MOP were still in place. Because of this finding and because of the EU's WTO obligation and overall dissatisfaction in the EU and U.S. trade with the complexity of the current system, the United States exercised its WTO rights and requested that the regime be renegotiated. The European Commission has agreed in principle, but it has been unable to get a negotiating mandate from the EU member states.

The Commission's most recent reported position is that a solution must 1) represent an applied duty that is either a percentage of the bound rate (€65/ton) or an absolute reduction from the bound rate that leaves the applied duty at or above €40/ton; 2) any long term solution on brown rice must be part of a Doha Round agreement; and 3) in the interim, the Commission will not allow the applied duty to reset to €65/ton. None of these points reflects the EU's obligations.

It is clear that the Doha Round of negotiations will not be the vehicle for improving U.S. market access or for rationalizing the EU's import regime. It now falls to the Trans-Atlantic Trade and Investment Partnership (T-TIP) as the mechanism to negotiate fully liberalized rice trade between the United States and the EU.

Biotechnology Regulation

The EU's regulatory approval structure for plant products containing genetically modified (GM) traits is the most significant non-tariff barrier to regaining historic levels of U.S. rice exports.

Following the unintended contamination of the commercial supply of U.S. long grain rice in August 2006 with the Liberty Link 601 and 62 GM traits, U.S. rice exports to the EU plummeted. Despite the successful effort of the U.S. rice industry to remove the LL traits from the commercial supply, trade has not returned and the lack of a functioning EU biotechnology regulatory approval process is responsible. The EU maintains a zero-tolerance regulatory policy towards the presence of unapproved GM traits in food and feed, and EU importers are unwilling to take the legal risk of large-scale imports of U.S. long grain rice, notwithstanding the effective elimination of LL traits.

The LL62 trait has the dubious distinction of being the longest-standing GM trait in the EU biotechnology approval pipeline. The trait has received a positive assessment from the European Food Safety Authority but final approval is languishing because of lack of political will by the European Commission and the Member States. While approval of LL62 would not remove the complete market access barrier, it is a necessary step.

USA Rice urges the U.S. government to use the T-TIP to negotiate a functioning, science-based EU regulatory regime for biotechnology in general, and to press for adoption of an EU low-level presence policy (LLP) for foods that would include specifically the LL601 trait. Such an LLP would remove the regulatory road block from reestablishing a market presence for U.S. long grain rice in the EU.

Estimate of increase in exports: \$25-\$50 million

JAPAN

Import Policies

Anticompetitive Practices

Japan is the second largest export market for U.S. rice, and market access in Japan is critical to the continued economic health of all segments of the U.S. rice industry. However, current market access in Japan is not optimal.

Sales in 2015 were valued at \$2788 million, representing 334,837 MT. The table below shows U.S. exports of rice to Japan since 2006.

U.S. Rice Exports to Japan

CY	Value (Million)	Quantity (MT)
2006	\$168	329,955
2007	\$168	303,130
2008	\$167	274,338
2009	\$422	400,453
2010	\$232	317,235
2011	\$303	374,835
2012	\$232	341,566
2013	\$204	294,685
2014	\$240	288,507
2015	\$278	334,837

Source: Dept. of Commerce, U.S. Census Bureau, Foreign Trade Statistics.

The United States supplies on average just under 50 percent of Japan's total rice imports, which is consistent with the U.S. rice industry's expectations, but imports from the U.S. represent only about 4 percent of Japanese rice consumption.

Japan purchases Japonica-style rice varieties from the United States, consistent with domestic market demand. To date, Japan has sourced all imports of U.S. rice from California, and sales to Japan account for just under one-quarter of annual production in California (measured on a milled rice basis).

Market access for rice identified as U.S. origin in Japan is limited by the import policies and anticompetitive practices of the Japan Food Department, the sole importer, and an agency of the Ministry of Agriculture, Fisheries and Forestry (MAFF). U.S. rice is most often destined for government stocks, designated for food processing use or livestock feed, or, occasionally, re-exported as food aid. Thus, virtually all imports of U.S. rice are prevented from entering the high-value retail market, and U.S. exporters are, as a result, unable to develop year-round marketing plans and consumer relationships.

A portion of Japan's rice commitment is imported under the Simultaneous-Buy-Sell (SBS) program. The U.S. rice industry believes the SBS system was designed to allow access for exporters to final consumers in Japan in order to engage in consumer market development. The SBS system, which provides a substantial mark-up to MAFF, has not allowed U.S. exporters to develop markets in Japan for

high-quality short and medium grain U.S. rice. The average mark-up, or tariff, on whole kernel rice for the eight SBS tenders held in the 2015/2016 Japan Fiscal Year (JFY) was \$376/mt for all origins and \$374/mt for U.S. rice.

The 2015/2016 SBS tenders were also unsuccessful, largely because of the mark-up levels which made imported rice non-competitive. Of the approximately 264,000 mt of whole kernel rice tendered for, awards were made for only 12,863 mt. In each of the eight SBS tenders, the amount of rice offered by exporters was far below the amount on tender, indicating commercial expectations that the mark-up level would prevent commercially viable sales within the SBS system.

Only a few types of companies (Japanese trading companies and rice mills) are permitted to access rice through SBS and the operation of the mark-up system lacks transparency. The lost value to U.S. exporters is the inability to reach Japanese consumers and develop a market for rice identified as U.S. origin. Such market access is critical to sustaining demand for U.S. rice.

The U.S. rice industry sought improvements in both the quantity and quality of U.S. rice access in Japan as a result of the Trans Pacific Partnership negotiations (TPP). Additional access for U.S. rice was negotiated and commitments were made by Japan to improve transparency of the SBS system and quota fill for a new U.S. country-specific tariff rate quota. However, a portion of the new access is undocumented, and USA Rice is seeking assurances that the additional access and improvements in tender administration will occur.

Estimate of increase in exports: \$25 million to \$50 million

TAIWAN

Import Policies

Under Taiwan's World Trade Organization (WTO) obligations, the U.S. rice industry enjoys a 64,634 metric ton (brown basis) country specific quota (CSQ). Since minimum access rice imports began in 2007, Taiwan has failed each year except in 2011-2013 & 2015 to import the annual CSQ from the United States (and in many years, from the three other WTO members which have CSQs). These shortfalls have not been made up and Taiwan has been and remains in violation of its obligations to the WTO.

Taiwan uses a non-transparent price ceiling mechanism which effectively allows import authorities to reject competitive tender offers and force bidders into a price negotiation. According to Taiwan's Council on Agriculture (COA), the price ceiling is a function of the export cost of rice, ocean freight, port arrival costs, and the domestic price of rice in Taiwan. If a country-specific government tender fails after three consecutive announcements, the tender becomes a "global" tender and rice from all origins can compete. This has allowed rice from other origins to supplant U.S. rice, or to allow Taiwan to skirt completely its rice import obligations (as was the case in 2007-2010 and 2014).

Despite technical assistance offered by the U.S. rice industry, Taiwan continues to use a price ceiling which can override multiple competitive bids from U.S. suppliers. Use of the price ceiling mechanism is responsible for the shortfalls listed below.

CSQ - USA Tender Results		(MT, brown basis)		
	CSQ Amount	Awarded Quota	USA Shortfall	Other WTO Shortfall
2007	64,634	29,795	34,839	Australia
2008	64,634	18,000	46,634	
2009	64,634	63,474	1,150	Australia
2010	64,634	57,000	7,634	
2011	64,634	64,634	0	
2012	64,634	64,634	0	
2013	64,634	64,634	0	Aust/Egypt
2014	64,634	46,100	18,534	Aust/Egypt
2015	64,634	64,634	0	

USA Rice is pleased that the United States and Taiwan held the first joint rice technical meeting in April 2016 in Taiwan. USA Rice has long asked for such a meeting as a vehicle to build trust and to discuss and resolve technical issues such as the price ceiling mechanism and Taiwan's grading standards and procedures. USA Rice is hopeful that this technical meeting will occur on an annual basis.

Estimate of increase in exports: \$25 million to \$50 million

KOREA

Import Policies

On January 1, 2015, Korea unilaterally implemented a tariff-based import regime for rice with a tariff of 513 percent on imports of rice above a set calendar year quota of 408,700 mt. Korea's move to tariffication replaced a system of rigid import quotas under a WTO-imposed Minimum Market Access agreement (MMA). Korea also eliminated the previous country specific quotas (including a CSQ for the United States) and a set aside of thirty percent of imported rice for use as table rice.

While the decision to move to a tariff-based system is Korea's to make, USA Rice opposes the very high level of the out of quota duty as inconsistent with WTO guidelines, elimination of CSQs, and elimination of the table rice provision. Following a series of bilateral discussions about an acceptable import regime going forward, the United States joined several other WTO members in formally objecting to Korea's tariffication and related tariff schedule. The objections remain, and the WTO has not officially accepted Korea's rice tariff schedule.

Estimate of increase in exports: \$25 million to \$50 million

THAILAND

Domestic Support & Export Subsidies

Thailand has utilized several price support programs for its domestic rice industry. The size and value of these programs raise serious questions as to Thailand's compliance with its WTO commitments as regards the aggregate measure of support and export subsidies.

Prior to the military coup in 2014, the government of Thailand operated the Rice Paddy Pledging Scheme, under which the government procured rice from producers at a price support level far above world market rates. Following the coup, the Thai military suspended the Paddy Pledging Scheme, replacing it with the Rice Farmer Assistance Program, consisting of subsidized credit to farmers and input subsidies, and a new paddy-pledging type program targeted at fragrant and glutinous rice.

As a result of the pre-2014 Paddy Pledging Scheme, the Thai government accumulated large stockpiles of rice, put at 8.4 million metric tons at the end of September 2014 by FAS/Bangkok. The current government has been selling rice stocks, and current stocks are below the 17.5 million mt held at the end of September 2014 (Thai Ministry of Finance).

Export Policies

The Thai government has regularly auctioned rice out of intervention stocks for domestic food, export, and non-food use. During January – August 2016, the government issued rice tenders totaling approximately 9.3 million metric tons. Approximately 3.9 million metric tons were sold, of which 3.5 million metric tons were food-grade rice for domestic consumption and the export market, while 0.4 million metric tons were non-food grade rice mainly destined for the feed industry. The government has reportedly suspended sales from stocks through the end of 2016 so as not to pressure prices during the main crop harvest.

It is very likely that sales to the export market by the Thai government were for less than the acquisition price (under the Paddy Pledging Scheme), and thus a violation of Thailand's WTO export subsidy commitments. Thailand bound its export subsidy limit for rice at zero in the WTO Uruguay Round, and is therefore is very likely violating its WTO obligations.

Estimate of increase in exports: *Thailand is a substantial net exporter of rice, and remedies of possible WTO violations will not result in appreciable exports of U.S. rice to Thailand. However, as traditionally the number one world rice exporter, government support by Thailand increases exportable supplies and thereby depresses global rice prices, causing damage to U.S. rice exports.*

India

Domestic Support

India has increased support to the agricultural sector sharply over the past decade. Support prices for rice, for example, increased by 130% in local currency terms between the 2005/06 and 2013/14 marketing years. Subsidies for agricultural inputs – fertilizer, electricity, irrigation and seeds – have risen even more quickly to over \$33 billion.

These developments are reflected in part in India's notifications to the WTO, but India's last notification covered marketing year 2010/2011, so recent official data are lacking. Additionally, the magnitude of the increase is masked by the methodology India uses to calculate its AMS. India made some significant changes in policy classification and AMS calculation methodology between its initial notifications in the late 1990s and notifications leading up to the most recent one covering MY 201/2011. It is unclear what motivated the changes, which occurred in the areas of fixed external reference prices, eligible production, and input subsidies, but their effect was to hide potential violations of WTO rules. These changes are discussed in more detail in *Agricultural Subsidies in Key Developing Countries: November 2014 Update*, DTB Associates.

India's minimum support prices (MSPs) for rice and a long list of other products are effectively price floors on the domestic market and the incentive prices for Indian producers. The government maintains internal market prices by purchasing large quantities of rice at the MSP, largely for use in the Public Distribution System (PDS). FAS/New Delhi estimates that the government of India has purchased about 30 to 35 percent of the total rice crop at least since 2008/2009.

The MSP is a powerful incentive to production. While the MSP for rice increased by 130% between 2005/06 and 2013/14, production increased by 13% and exports went from 4.3 million MT to 10 million MT. In 2013, India was the number one exporter of rice in the world.

The report by DTB Associates referenced above raises serious and compelling questions about India's compliance with its WTO obligations in terms of India's aggregate measure of support. The lack of notification by India to the WTO since 2010/2011 of domestic supports for agriculture adds to the concern about WTO compliance. At a minimum, the United States should insist that India become current on its notification and, if India does not respond, conduct a counter-notification using publically available data.

Estimate of increase in exports: India is a substantial net exporter of rice, and remedies of possible WTO violations will not result in appreciable exports of U.S. rice to India. However, government support by India increases exportable supplies and thereby depresses global rice prices, causing damage to U.S. rice exports.

COLOMBIA

Import Policies

The Colombia—United States Trade Promotion Agreement (TPA) went into effect in May 2012. Under the TPA, a gradually increasing amount of U.S. rice is allowed into the country duty free via annual tariff rate quotas (TRQ). Out of quota duties are 80% through the year 2017 before declining to zero by 2030. In 2016, a total of 94,209 MT of milled rice will be shipped duty free from the U.S. to Colombia.

While the U.S. TRQs have filled each year, Colombian producers have been successful in limiting the entry of U.S. rice largely to the first half of each calendar year. The effect is to deny U.S. exporters and their Colombian partners the opportunity to market rice 365 days a year to Colombia's consumers. This restriction runs counter to the expectations of the U.S. industry as well as the intentions of U.S. officials negotiating the TPA. USA Rice urges the administration to continue engagement with Colombian

officials to obtain full-year access for U.S. rice in Colombia. This is particularly important because the TRQ increases in size each year by 4.5 percent.

Colombia also restricts imports of U.S. rough rice to certain mills in the Barranquilla region because of the detection of *tilletia horrida* in shipments. In December 2013, the Colombia Agricultural Institute (ICA) claims to have found *t. horrida* in domestic mills and production areas. ICA is conducting a survey to assess the extent of contamination within rice production areas. The results of this study have been delayed for years; originally due in October 2014, the survey is now estimated to be released in early 2017. This study is long overdue, and Colombian authorities continue to refuse to consider lifting import restraints on U.S. milled rice pending the study's completion.

Estimate of increase in exports: No specific increase in U.S. exports is expected from the successful resolution of the barriers listed above. Rather, the U.S. rice industry will benefit more broadly by removing scientifically unjustified restrictions on imports of U.S. paddy rice and the opportunity to develop marketing plans to Colombia's consumers that are based on the ability to ship and have access to Colombia each day of the year.

TURKEY

Import Policies

Turkey remains an important but variable market for U.S. rice. Paddy rice from the South, and sometimes California depending on price, dominates U.S. rice exports to Turkey.

U.S. Rice Exports to Turkey

CY	Value (Million)	Quantity (MT)
2006	\$4.1	17,789
2007	\$1.1	1,725
2008	\$75.5	133,670
2009	\$18.3	44,252
2010	\$180.0	427,498
2011	\$45.0	96,648
2012	\$59.4	152,498
2013	\$62.2	141,248
2014	\$122.0	244,502
2015	\$43.9	107,233

Source: Dept. of Commerce, U.S. Census Bureau, Foreign Trade Statistics.

Consistent access to this market is hampered by Turkey's phytosanitary policy on the white-tip nematode, and the lack of science-based policy regarding GMO contamination in bulk shipments. Despite extensive efforts by the U.S. Agricultural Counselor in Turkey and USDA's Animal and Plant Health Inspection Service (APHIS), the Turkish government has not adopted science-based testing protocols for imported rice for the presence of white-tip nematode and genetically modified traits.

The white tip nematode is present in the United States and Turkey, but the reaction of Turkey's phytosanitary officials has been severe, and efforts to reach a mitigation that would permit U.S. trade have not been successful. The issue appears at the time of this writing to be at a standstill.

Officials in Turkey have reacted just as severely in their opposition to any trace of GMO contamination. Even though there is not GMO rice commercially produced in the United States, GMO contamination has been detected in U.S. rough rice transported in bulk ships which previously held cargoes of corn and soybeans. These shipments have been rejected. The uncertainty caused by Turkey's GMO policies significantly increases the risk, and thus the cost, of shipping rice to Turkey, creating a disincentive for U.S. rice exporters. Turkish authorities to date has not shown interest in developing a science-based and commercially viable policy on adventitious presence for GMO traits.

Estimate of increase in exports: \$25 million to \$50 million