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Rebecca Davis
Director
Topeka Regional Office
2641 SW Wanamaker Rd., Suite 2
Topeka, KS 66614-4971

Dear Rebecca:

The National Sunflower Association (NSA) is comprised of 25,000 farmers and over 250 private industry members. Our association is the national organization for the US sunflower industry. The NSA Board of Directors is made up of farmers and sunflower industry members representing the states of North and South Dakota, Minnesota, Kansas, Colorado, Nebraska, Oklahoma and Texas.

These comments are in reference to the Risk Management Agency (RMA), Topeka Regional Office seeking comments and recommendations regarding non-irrigated sunflower insurance programs in western Kansas, western Nebraska and eastern Colorado

Based on comments from many producers in these states, we are asking you to defer any action on this issue for the 2011 crop year until there can be more discussion, documentation and data gathering from those with an interest in this issue.

We do not believe that all non-irrigated summer crops should be treated in the same way. The losses that have occurred in sunflowers in the last ten years are relatively small in comparison to some other crops in these states. RMA is proposing restrictive planting limitations that would affect all producers. This would impact the producer who has not experienced a loss (or minimal losses). That producer would be heavily penalized. It would seriously disrupt his farming operation. If there are large losses in certain instances, RMA and the insurance industry needs to deal with the problem on a case by case basis and not restrict planting choices for all producers. If there is abuse of crop insurance, better enforcement of moral hazard needs to take place to stop abusers of crop insurance.

NSA understands RMA's concern when producers plant a crop when it is too dry for it to achieve average county yields. However, we believe that the time frame RMA is using (1999-2008) is inadequate and corresponds to a non-representative period, characterized by excessive drought. There are times when drought conditions persist in an area and the

National Resources Conservation Service (NRCS) makes a declaration that no tillage or planting should take place. In cases like this the producer is allowed to take prevent plant insurance coverage as an option. When conditions are that severely dry, RMA should request NRCS to make such a declaration. This protects the agency from excessive payments and also protects the producer income without making unnecessary planting investments. I believe that this provision is already included in the general crop insurance policy for all crops.

Planting sunflower in these counties is successful when a producer uses good farming practices. Sunflower is one of the most drought tolerant crops that producers can plant in these counties. In the last several years the sunflower industry has introduced Clearfield and Express tolerant weed control options. This allows a producer to no-till and control broad leaf and grassy weeds post-emergent. Hybrid seed continues to improve with enhanced yields and agronomic traits. Seed treatments have advanced considerably as have options to control diseases like rust.

At this point NSA does not have a clear cut alternative to offer RMA but we want to do what is best for producers in all three states. In essence we do not want a rotation statement that would require very specific farming practices which can have a very narrow regional (in state regional) scope. It would be similar to requiring a certain amount of seed to be planted on each acre which overrode the issue of 'best management practices'. The agronomics of producing a crop in any given county is different based on soil types, weather conditions and producer experience. I don't believe that RMA should go down the road of influencing or micro managing producer planting decisions.

Again, we ask the agency to defer any action until more data has been gathered and all options have been considered. We will continue to visit with our membership for workable alternatives to the proposed rotation statement. Let's continue the dialogue on this issue so that RMA can come up with a solution to this problem that in the end will not hurt sunflower producers and an industry that depends on that production.

Sincerely

Donald Schommer
President
National Sunflower Association