



August 12, 2026

Office of Management and Budget
Comments on Proposed Updates for 2027
2026-14086 (91 FR 42976)

Submitted via <https://www.regulations.gov/commenton/USBC-2026-0133-0001>

RE: Request for Comment on Proposed Updates for 2027; Statistical Policy Directive No. 8: North American Industry Classification System (NAICS)
A Proposed Update by the Bureau of the Census July 13, 2026

The National Corn Growers Association (NCGA) appreciates this opportunity to provide comments to the Office of Management and Budget (OMB) on the Economic Classification Policy Committee's (ECPC) recommendations for the 2027 revision to the North American Industry Classification System (NAICS). NCGA represents more than 36,000 dues-paying corn growers and the interests of more than 500,000 farmers who contribute through state corn checkoff programs. With corn produced in 48 states and exported to more than 60 countries, establishing the statistical tools needed to explicitly measure the bioeconomy across the full value chain is essential to understanding its economic impact and maintaining U.S. competitiveness in global markets.

NCGA encourages OMB to ensure that the 2027 revisions adequately recognize the rapidly expanding biobased products and biomanufacturing sectors by including an industry-specific classification for these activities. Biomanufacturing, biotechnology, and products such as bioplastics and biofuels should be considered for unique classification on their own. We urge OMB to reconsider the ECPC's decision to not include any bioeconomy-related updates in their proposed 2027 NAICS revisions. This recommendation remains consistent with the congressional mandate in the 2018 Farm Bill and recent legislative action on the Farm Bill reauthorization to develop specific classifications for these industries. For several decades, there has been significant growth and diversification in the use of biobased feedstocks for chemicals, technology, and other biobased materials. While growth in this sector has made significant contributions to rural America and the overall U.S. economy, measuring its true scope and value cannot be achieved without the industry-specific classification.

Current industry classifications do not fully capture the bio-industrial economic activity that converts corn and other agricultural feedstocks into renewable chemicals, materials, plastics, fuels, products, textiles, and other biobased goods. As a result, federal statistical agencies cannot accurately measure the size, growth, investment, employment, or economic contribution of these industries. Corn-based biomanufacturing has significant potential to replace fossil-derived chemicals and materials. Capturing a 10% share of the global plastics market could result in 6.6 billion bushels of corn demand, a significant demand boost for the U.S. corn industry. Without classifications that distinguish biobased manufacturing from traditional petroleum-based manufacturing, particularly when the products are identical and only distinguishable using ASTM 6866, these activities remain dispersed across numerous existing codes, masking the true scale of the U.S. bioeconomy and limiting investment signals that could drive diversification of demand for U.S. farmers.



Improved industry classification would provide greater transparency into the demand created by renewable agricultural feedstocks. Corn growers supply essential raw materials for an expanding range of biobased products beyond traditional uses. Quantifying the impact of uses such as sustainable aviation fuel, bioplastics, renewable chemicals, and other new uses helps show the potential economic impact of expanding these markets. The absence of clearly identifiable industry classifications limits the ability to measure whether existing policies are increasing domestic production, attracting private investment, creating jobs, or expanding markets for U.S. agricultural commodities.

A more robust NAICS classification would improve the federal government's ability to evaluate policies intended to strengthen domestic manufacturing and supply chains. Congress has already recognized the importance of improving statistical classifications and prioritized the bioeconomy through investments in biomanufacturing, renewable materials, and agricultural innovation. Section 9002 of the 2018 Farm Bill directed the U.S. Department of Agriculture (USDA), in coordination with the U.S. Department of Commerce, to jointly develop recommendations for specific NAICS classifications for renewable chemical manufacturers and biobased product manufacturers. This directive acknowledged that existing classifications do not adequately capture these emerging industries and underscored the need for more accurate economic measurement. The 2027 revisions provide OMB with the opportunity to follow this congressional mandate and better support rural America and manufacturers.

Finally, specific NAICS classifications for biobased products would enhance U.S. competitiveness, support domestic manufacturing, and reduce reliance on foreign made materials and chemicals. Global competitors continue to invest heavily in industrial biotechnology and biomanufacturing, leaving the U.S. at a competitive disadvantage. Without the ability to accurately measure and track the growth of its own bioeconomy, the U.S. risks falling even further behind. The U.S. has statistical systems capable of accurately measuring these industries, benchmarking domestic growth, and informing future policy decisions. Reliable economic data is foundational in fostering innovation, supporting the growth of this emerging industry, and remaining a global leader in the bioeconomy.

The continued growth of the U.S. bioeconomy depends on the ability to accurately measure it. NCGA encourages OMB to establish dedicated NAICS classifications for biobased products and biomanufacturing so that federal statistics can better capture this emerging sector, inform future policy decisions, and reflect the full economic contribution of renewable agricultural feedstocks.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jed Bower", written in a cursive style.

Jed Bower
President
National Corn Growers Association