

## 50 Shades of Amber: The 2014 Farm Bill and the WTO

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*The 2014 farm bill reduced expected budgetary costs of U.S. farm programs, according to estimates prepared by the Congressional Budget Office. Cost projections are very sensitive to market conditions and program participation assumptions, and stochastic analysis indicates that farm program costs could easily differ from expected values by \$5 billion or more in any given year. By replacing direct payments with new policies that make payments tied to market prices and yields, the bill could have important WTO implications. If the new policies are classified as non-commodity specific amber box support, projections indicate that existing WTO limits on the current Aggregate Measure of Support would not be exceeded on average, but could be under some market conditions. Furthermore, the new policies are very likely to exceed some WTO rules proposed by various parties in the Doha Round negotiations.*

*Key words: agricultural supports, budget outlays, WTO domestic support disciplines*

### Introduction

Lauded as providing the “most significant reduction to farm policy spending in history” (Lucas 2014) and a “landmark shift in agricultural policy” (Stabenow 2014), the 2014 farm bill replaced direct payments with new policies that make payments tied to market prices and yields and provide enhancements to the existing crop insurance program. While those changes are expected to significantly reduce budgetary outlays on average (Congressional Budget Office 2014), the new price and revenue dependent programs will likely add significant variability and increase exposure to high budget outlays under certain market conditions (FAPRI 2014).

Moreover, the shift away from fixed direct payments to price and revenue dependent programs will likely have important implications for U.S. domestic support obligations under the World Trade Organization (WTO) as support moves away from green box policies to more production-distorting amber box policies. Critics have argued that the 2014 farm bill will potentially expose the United States to future trade disputes similar to the successful WTO dispute settlement case brought by the Brazil against U.S. cotton subsidies (Smith 2014, Carter 2014). As Senator Pat Roberts warned during the floor

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debate over passage of the farm bill, “The WTO stove is still hot—why would we reach out and touch it again?”

This paper examines the potential WTO exposure of U.S. domestic support under the 2014 farm bill. We begin with a brief overview of the 2014 farm bill followed by a discussion of how the new support policies would be classified under the current WTO agreement and under the proposed changes to domestic support disciplines under the Doha Round. A description of the FAPRI simulation model follows. We then assess the likelihood of exceeding current WTO limits under the 2014 farm bill as well as potential exposure under the proposed Doha disciplines. Conclusions are offered in the final section.

### **An overview of the 2014 farm bill**

The 2014 farm bill covers a number of areas including energy, rural development, trade, and nutrition (Congressional Research Service 2014). Our focus here is on the price and income support programs, crop insurance and the Conservation Reserve Program. The new farm bill eliminates the direct (DP) and countercyclical payment (CCP) programs as well as the Average Crop Revenue Election (ACRE) program and creates several new programs. Grain and oilseed producers will have the choice between coverage under the Price Loss Coverage (PLC) program or the Agricultural Risk Coverage (ARC) program. Under PLC, participating producers receive a payment when national season-average farm prices fall below fixed reference prices. Under ARC, payments occur when county or farm-level revenues per acre fall below 86 percent of a benchmark. The benchmark depends on moving five-year Olympic averages of national prices and county or farm yields.

The new reference prices are higher than the target prices that were used in calculating countercyclical payments under the previous farm bill and potential exposure is increased as well (table 1). The maximum payment rate under the CCP program was calculated as the target price minus the direct payment rate minus the loan rate. Under the new PLC program, the maximum payment rate is simply the target price minus the loan rate. As loan rates for grains and oilseeds are unchanged, maximum payment levels are far higher under the new farm bill than under the 2008 farm bill.

ARC payment rates vary based on historical prices and yields. Based on current estimates of 2009-13 prices, implied reference prices for 2014 are high relative to CCP reference prices, and for many crops, relative to PLC reference prices. Because ARC payment rates are capped at 10 percent of the benchmark revenue, exposure is more limited than under PLC.

The Supplemental Coverage Option (SCO) offers producers additional area-based insurance coverage in combination with coverage by traditional crop insurance policies. The program provides coverage based on county average yield or revenue and will be made available beginning with the 2015 crop. Subsidies will cover 65 percent of producers' premiums. SCO coverage is not available to producers who elect to participate in either the ARC program or the Stacked Income Protection Plan (STAX).

STAX provides revenue insurance policies to producers of upland cotton beginning with the 2015 crop, in place of coverage for cotton under the new Price Loss Coverage (PLC) and Agriculture Risk Coverage (ARC) programs. To provide support while the new program is being implemented, upland cotton producers will receive transition payments for crop year 2014 and also for crop year 2015 in any areas where STAX policies are not yet available. STAX policies can supplement insurance coverage available through the Federal crop insurance program, or be purchased as a stand-alone policy. Federal subsidies will cover 80 percent of producers' premiums.

The Margin Protection Program (MPP) for dairy producers offers producers insurance based on the average actual dairy production margin (difference between the all-milk price and average feed cost), with payments beginning when the margin falls below \$4.00 per hundredweight (cwt) for a 2-month period. Benefits apply to a participating operation's production history, adjusted annually to reflect national average milk production increases. All dairy operations are eligible to participate, and pay only the administrative fee (\$100) if they select protection at the minimum margin level (\$4.00 per cwt of milk). Higher levels of protection are available, for which producers must pay both the administrative fee and a premium. Premiums are lower for coverage below 4 million pounds of milk production (equivalent to a herd of about 185 cows). These lower premiums are also reduced by 25 percent during both 2014 and 2015.

## **An overview of WTO domestic support disciplines**

In the simulations that follow, domestic support is measured relative to the current Uruguay Round Agreement on Agriculture (URAA) and proposed Doha disciplines as outlined under the so-called Rev 4 text of December 2008 (DDA). The URAA provides disciplines concerning market access (such as tariffs and other restrictions on imports), export competition (such as export subsidies), and domestic support measures. Various "boxes" of permitted domestic support are defined (Table 2).

*Green* box subsidies are judged to have only minimal trade-distorting effects. To be included in the green box, programs must not be tied to production or prices, and must meet specific policy criteria spelled out in the URAA. The current WTO agreement places no limits on expenditures on green box subsidies, and the Doha negotiations also appear unlikely to result in any such limits.

*Amber* box subsidies are judged to have larger trade-distorting effects, and are limited by the URAA. Amber box support includes payments to producers that are tied to current production levels, price support programs, and other policies. These subsidies are converted into an “Aggregate Measurement of Support” by following a set of prescribed accounting rules. Under the URAA, each country commits to maintain its “total current AMS” below an agreed level. The proposed DDA text would sharply reduce the level of allowed amber box subsidies in aggregate, and for the first time would place commodity-specific limits on amber box subsidies.

Amber box policies are further classified into two groups: product specific or non-product specific. The main U.S. product-specific amber box policies in the AMS under the 2008 farm bill were payments under the marketing loan programs (loan deficiency payments and marketing loan gains) and ACRE for grains, oilseeds, and cotton, and the price support programs for dairy and sugar. For the marketing loan program and ACRE, the AMS is measured by the budgetary outlays in a marketing year. The United States has historically notified crop insurance premium subsidies and CCP payments as non-product specific support (Smith and Glauber 2012).

Both product specific and non-product specific amber support are subject to *de minimis* tests. Under the URAA, if support is less than 5 percent of the value of current production, support is considered *de minimis* and excluded from calculations of the total current AMS. The proposed DDA text would lower the threshold for *de minimis* to 2.5 percent.

The *blue* box of support represents a political compromise to capture policies that are judged to be too distortive to qualify as green box subsidies, but less distortive than amber box subsidies. The United States does not report any of its current support policies as being blue box subsidies. Under the proposed DDA text, CCP payments would be classified as blue box subsidies, and would be limited in aggregate and by commodity.

Doha Round negotiations have proposed the creation of a measure of “overall trade distorting support” (OTDS) that would also be disciplined. The OTDS would represent the sum of the total current AMS, blue box support, and *de minimis* support.

## **How would new farm programs be likely classified?**

Where the new farm bill continues past program provisions, it is assumed that past notification precedents will hold. This means, for example, that most crop insurance premium subsidies are treated as non-product specific amber support, marketing loan benefits are treated as product-specific amber support, and the implicit value of the sugar price support program is also treated as product-specific amber support.

PLC and ARC payments are treated as non-product specific amber under the reporting system established under the URAA, and as blue box support under Doha Round modalities accounting. PLC and the county version of ARC make payments tied to base acreage that are generally not tied to current production. One exception to this general rule is generic base (former cotton base acreage) where payments are tied to the mix of crops grown in a particular year. The individual version of ARC also makes payments that are linked to current production choices. The exceptions are ignored in the present analysis.

Net outlays under the new dairy program are treated as product-specific amber support.

Premium subsidies under the new Stacked Income Protection Program (STAX) policy are also treated as product-specific amber support. Because SCO is available for a broader range of commodities, its premium subsidies are treated as non-product specific amber support, the same as for other crop insurance policies.

## **FAPRI-MU model**

The domestic support measure estimates are derived from an augmented version of a model developed by the Food and Agricultural Policy Research Institute at the University of Missouri to conduct stochastic analysis of U.S. agricultural markets and policies (Gerlt and Westhoff 2011; Meyers et al. 2010; Westhoff, Brown and Hart 2006). The model determines supply, use, trade and prices for major crop, livestock and biofuel markets, farm program outlays, farm income, consumer food costs and other indicators. The model is used to develop ten-year baseline projections and estimates of the impacts of proposed changes in agricultural and biofuel policies (e.g., FAPRI 2014, FAPRI 2013, Thompson, Meyer and Westhoff 2010).

To develop stochastic estimates for the 2000 endogenous variables in the model, 500 correlated random draws are made from several sets of exogenous variables. To represent weather uncertainty, error terms from yield equations and deviations from normal ratios of harvested to planted area are used. Draws are also made from energy

prices, production cost indices, and the error terms of various domestic and export demand equations. This is a partial stochastic approach; clearly there are many sources of risk and uncertainty that are not captured. Results are inspected to ensure that the variances and co-variances of key variables are consistent with expectations; if they are not, changes are made in model equations or in the random draws until results are judged reasonable.

Analysis of the PLC program is straightforward, as PLC provisions are generally similar to the previous countercyclical payment program, although the support levels are very different. To examine the ARC program, a separate simulation model was built to estimate county-level ARC payments. Given national-level estimates of prices and state-level estimates of yields, the model generates consistent estimates of the county-level yields and calculates resulting payments to producers enrolled in the county version of the ARC program. Estimates of payments under the individual version of ARC are generated based on the simulated county yields and assumed variances of farm-level yields relative to county-level yields.

In the March 2014 baseline used to conduct this analysis, participation rates in ARC and PLC were set exogenously, based on comparisons of estimated benefits under the two programs and analyst judgment. For example, given projected prices, estimated PLC benefits far exceeded ARC benefits for rice and peanut producers, so 90 percent of base area for those two crops was assumed to be enrolled in PLC. In contrast, estimated average ARC payments generally exceeded PLC payments for soybeans. Only 60 percent of soybean base area was assumed to enroll in ARC, because PLC participants can also enroll in a new crop insurance program (Supplemental Coverage Option) which is not available to ARC participants and which could provide significant benefits to some producers.

For corn, estimated average payments were similar under the two programs over the five-year life of the farm bill, and the assumed participation rate in each program is 50%. ARC payments were estimated to be larger in early years of the baseline, but average PLC payments were greater in later years and the SCO option would also be of interest to some. In the case of wheat, estimated average PLC payments exceeded ARC payments after 2014 by a modest margin, and it was assumed that 70% of producers would enroll in PLC. Estimates suggest the county version of ARC will generate more payments for most producers than the individual version, but this is not universally true and some producers may judge that the individual version provides better risk management at the farm level. For each crop, it is assumed that one-fourth of ARC participants will enroll in the individual version.

Using stochastic model results, a satellite model generates 500 sets of estimates of the various WTO domestic support measures for the 2014-2023 period. This process

generates 500 sets of estimates of the various WTO domestic support measures for the 2014-2023 period. These are intended to reflect appropriate correlations among key variables. For example, the correlation of corn and soybean prices means that most outcomes that generate large PLC payments for one commodity will usually generate large PLC payments for the other as well. Likewise, outcomes that generate low prices will also tend to generate a low estimated value of production, which reduces *de minimis* levels and thus increases the likelihood that measured support will be included in the total current AMS. Given the partial nature of the stochastic analysis and other limitations of the work, it would not be appropriate to interpret the share of outcomes that generate a specific result to be true probabilities, but they should at least help identify issues that may be faced in meeting WTO obligations.

### **The 2014 farm bill and current obligations under the URAA**

Table 3 shows mean outcomes for domestic support measures based on the 2014 FAPRI baseline. The mean annual reported AMS over the life of the 2014 farm bill (2014-18) is \$5.733 billion, compared to average AMS reported to the WTO for 2008-11 of \$4.824 billion. Mean AMS levels for 2019-23 show a small decline to \$5.554 billion reflecting slightly smaller mean outlays in the out-years.

While projected AMS levels are similar in magnitude to more recent historical levels under the 2008 farm bill, the composition of support varies significantly. For product specific amber support, dairy falls from an annual average of \$3.267 billion over 2008-11 to a projected annual average of \$700 million over 2014-18 and only \$217 million over 2019-23. As Orden and Zulauf (2015, this session) point out, that decline reflects the change from a price support measure defined by an external reference price and the statutory price support to a measure based on estimated outlays under the MPP program. Total product specific amber support for 2014-18 is projected to average \$2.928 billion, of which \$115 million is *de minimis* and excluded from the reported AMS. That compares to \$5.346 billion of product specific amber support provided annually over 2008-11, of which \$522 million was *de minimis*.

Non-product specific amber support averaged \$7.643 billion over 2008-11, of which about 75 percent was accounted for by crop insurance premiums (\$5.822 billion). None of the non-product specific support was reported as part of the AMS because it was less than *de minimis* thresholds. Indeed, since the United States began reporting domestic support to the WTO in 1995, non-product specific support has never exceeded *de minimis* levels.

The simulations here suggest that outlays under the new PLC and ARC programs will likely increase non-product specific outlays. Average non-product specific outlays are estimated to average \$12.011 billion over 2014-18 and \$12.498 billion over 2019-23.

Combined levels of ARC and PLC payments account for the bulk of that increase. Moreover, the simulated outcomes suggest that non-product specific support may exceed de minimis levels in almost 15 percent of the annual outcomes over most of the projection period (figure 1). Averaged over all outcomes, non-product specific support exceeding de minimis averaged \$2.92 billion over 2014-18 and \$3.035 billion over 2019-23. Of course, in cases when the de minimis threshold is not exceeded, this is zero; the average for those cases exceeding the threshold was \$20.0 billion over 2014-18 and \$21.3 billion over 2019-23.

Table 4 shows the potential exposure of the 2014 farm bill relative to limits under the URAA. Based on 500 simulated 10-year histories, the portion of outcomes where the AMS exceeds the URAA limit (\$19.1 billion) at least *once* over the life of the farm bill (2014-18) is estimated at 51.6 percent and almost 73 percent over the 10-year period (2014-23). As expected, the exposure is largely tied to participation in PLC where the maximum payment rates are far larger than under the ARC program. To analyze further, we considered the extreme cases of 100 percent participation in each program. Figure 1 shows that the proportion of outcomes exceeding the URAA limits is near zero assuming 100 percent participation in ARC while the proportion of outcomes climbs to over 20 percent annually assuming 100 percent participation in PLC. The proportion of outcomes where the AMS exceeds the URAA limit at least once over 2014-23 is almost 85 percent assuming 100 percent participation in PLC while less than 3 percent assuming 100 percent participation in ARC.

The high exposure to WTO limits under the 2014 farm bill is surprising given how little attention was given to the topic during the farm bill debate. In their analysis of the House and Senate bills in 2013, FAPRI concluded: “Given URAA accounting rules, preliminary estimates suggest that the United States would be unlikely to exceed its commitment to limit amber box spending under either bill (FAPRI 2013, p. 28).” What changed to make that possibility so much more likely?

First, reflecting record global grain and oilseed production in 2013, projected prices in the FAPRI 2014 baseline are 10-15 percent lower than under the 2013 baseline. More importantly, however, is the fact that compromise package took the high reference prices for PLC from the House bill but made them payable on base acres as under the Senate bill. The combination was to create potential exposure issues in an area where up until now there had been none—non-product specific support. In over 99 percent of the outcomes where the URAA limit is breached it is due to non-product specific support exceeding de minimis.

Is there a way to minimize exposure? One obvious answer would be to reclassify support in the non-product specific category as product-specific. However, this is no panacea as the levels of support are high enough to tip either the product-specific support or non-product specific support or both above URAA limits. For example, many have criticized the United States and others for notifying crop insurance as non-product specific support (Smith and Glauber 2012; Zulauf and Orden 2012; Smith 2014). Preliminary analysis suggests that notifying crop insurance as product specific amber support would still leave substantial exposure with about one-fifth of the simulated projections triggering at least once over the 10-year period.

### **The 2014 farm bill and proposed DDA disciplines**

As outlined above, proposed texts in the Doha Round negotiations would tighten disciplines on domestic support by reducing the ceiling for AMS, reducing the de minimis thresholds, imposing a cap on blue box spending and by capping the overall trade-distorting support measure (OTDS). In addition, the texts would impose product-specific caps on amber and blue box spending. We now turn to analyze how DDA disciplines would affect spending levels under the 2014 farm bill.

Projected expenditures are compared to the proposed limits in table 5. The analysis assumes that DDA disciplines are implemented fully in 2014 and ignores disciplines related to market access and export competition that could have significant market effects not considered here.

With several exceptions, expected mean outlays for amber box outlays are largely estimated to be below product-specific amber caps over 2014-23. The proportion of 10-year histories where outlays exceed caps at least once over 2014-23 is low for most commodities other than sugar (where support exceeds the cap in all simulated outcomes), cotton (where STAX and marketing loan outlays combine to exceed caps at least once in almost 70 percent of the simulated histories, and peanuts (where marketing loan payments exceed caps at least once in about one-third of the simulated histories).

Under the proposed DDA limits, the cap on total AMS would be reduced 60 percent from \$19.1 billion to \$7.6 billion. Total AMS spending is estimated to remain under the \$7.6 billion limit over most of the simulations (figure 2). With ARC/PLC payments no longer classified as non-product specific support, the number of outcomes where non-product specific support exceeds de minimis levels is less than 5 percent in any year, despite the reduction of the de minimis threshold from 5 percent of the value of production to 2.5 percent. As a result, 34 percent of the simulated AMS histories are estimated to exceed the cap at least once over 2014-23.

Assuming ARC and PLC payments on non-generic base acres would be classified as blue box, mean outlays exceed blue box caps for many of the commodities. The proportion of histories where ARC/PLC payments exceed blue box caps at least once over 2014-23 is over 94 percent for all commodities which suggests that blue box caps would be more binding than amber product specific caps for most commodities. The overall blue box cap is more binding than the overall AMS cap as well. Almost 99 percent of the simulations showed total blue box support exceeding the aggregate blue box cap of \$4.8 billion at least once over the 10-year period.

Mean outlays for the OTDS measure are estimated at \$15.1 billion which exceed the proposed cap of \$14.5 billion. The proportion of outcomes where the OTDS exceeds the cap in any given year is over 40 percent and the proportion of histories where the OTDS exceeds the cap at least once over 10 years is almost 100 percent.

## **Conclusions**

While it is important to reiterate that one must not interpret the share of outcomes that generate a specific result to be true probabilities, our analysis suggests that under certain market conditions, spending under the 2014 farm bill could approach or exceed URAA limits. Farm legislation since 2002 has required the Secretary of Agriculture to take action in the event that URAA limits should be breached. For example, Section 1601 (d) of the 2014 farm bill states that if the Secretary of Agriculture determines that outlays will exceed URAA limits, “the Secretary shall, to the maximum, extent practicable, make adjustments in the amount of such expenditures during that period to ensure that such expenditures do not exceed the allowable levels.” However, the so-called “circuit breaker” language does not give any indication as to how or when adjustments should be made. Any adjustments would be controversial given the difference in timing and magnitude of payments.

The new policies under the 2014 farm bill are very likely to exceed some WTO rules proposed in the Doha Round negotiations. Whether that fact makes completion of the Round more difficult as suggested by Orden and Zulauf (2015) remains to be seen, but clearly new disciplines would require changes in current policies. Also, proposed cuts in farm programs under a new trade agreement would be weighed carefully against gains in other areas such as market access.

Lastly, our analysis does not address the question of vulnerability of the 2014 farm bill to a WTO challenge under other provisions such as the Agreement on Subsidies and Countervailing Measures. As pointed out by others (Sumner 2005, Schnepf and Womack 2006; Zulauf and Orden 2012; Smith 2014) the success of such challenges may depend on many other factors than simply subsidies levels but as the Brazil cotton case demonstrate, a country can successfully challenge another country’s commodity

policies even when their total AMS is within URAA limits. Whether the “WTO stove is still hot” may be an open question, but our analysis suggests that the United States is standing closer to that stove under its new farm legislation.

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**Table 1—Reference prices and maximum payment rates under the 2008 and 2014 farm bills**

| Crop            | Reference price |        |        | Maximum payment rate |        |       |
|-----------------|-----------------|--------|--------|----------------------|--------|-------|
|                 | CCP             | PLC    | ARC    | CCP                  | PLC    | ARC   |
| Wheat           | 4.17            | 5.50   | 5.68   | 0.71                 | 2.56   | 0.66  |
| Barley          | 2.63            | 4.95   | 4.61   | 0.44                 | 3.00   | 0.54  |
| Corn            | 2.63            | 3.70   | 4.55   | 0.40                 | 1.75   | 0.53  |
| Oats            | 1.79            | 2.40   | 2.80   | 0.376                | 1.01   | 0.33  |
| Sorghum         | 2.63            | 3.95   | 4.38   | 0.33                 | 2.00   | 0.51  |
| Soybeans        | 6.00            | 8.40   | 10.55  | 0.56                 | 3.40   | 1.23  |
| Peanuts         | 495.00          | 535.00 | 444.35 | 104.00               | 180.00 | 51.67 |
| Long grain rice | 10.50           | 14.00  | 11.70  | 1.65                 | 7.50   | 1.36  |

All prices in dollars per bushel except peanuts (\$/ton), rice (\$/cwt). ARC prices and maximum payment rates are estimated for 2014 based on season average prices paid to farmers for 2009/10 to 2013/14 (NASS) and assume 2014 yields equal the 2009-2013 Olympic average. The prices triggering 2014 ARC payments would be lower (higher) if 2014 yields are above (below) the Olympic average. Prices triggering ARC payments would change each year, since benchmark revenues are based on moving averages of prices and yields.

**Table 2— Assumed classification of support**

| Program                                  | URAA                       | Doha                             |
|--|----------------------------|----------------------------------|
| Marketing loans/loan deficiency payments | Product specific amber     | Product specific amber           |
| Agriculture Risk Coverage (ACR)          | Non-product specific amber | Blue                             |
| Price Loss Coverage (PLC)                | Non-product specific amber | Blue                             |
| Sugar price support                      | Product specific amber     | Product specific amber           |
| Crop insurance premium subsidies         | Non-product specific amber | Green/Non-product specific amber |
| Supplemental Coverage Option (SCO)       | Non-product specific amber | Non-product specific amber       |
| Dairy Market Protection Plan (MPP)       | Product specific amber     | Product specific amber           |
| Stacked Income Protection (STAX)         | Product specific amber     | Product specific amber           |

**Table 3—Mean of 2014 baseline outcomes compared to 2008-11 historical levels**

| <b>Category</b>                   | <b>2008-11</b>         | <b>2014-18</b> | <b>2019-23</b> |
|-----------------------------------|------------------------|----------------|----------------|
|                                   | <i>Million dollars</i> |                |                |
| <b>Product specific amber</b>     |                        |                |                |
| Dairy                             | 3,267                  | 700            | 217            |
| Sugar                             | 1,270                  | 1,447          | 1,523          |
| Other                             | 809                    | 781            | 984            |
| Total ps amber                    | 5,346                  | 2,928          | 2,724          |
| Included in AMS (URAA)            | 4,824                  | 2,812          | 2,519          |
| De minimis                        | 522                    | 115            | 205            |
| <b>Non-product specific amber</b> |                        |                |                |
| Crop insurance                    | 5,822                  | 6,755          | 7,070          |
| CCP                               | 364                    | na             | na             |
| ARC                               | na                     | 1,700          | 1,114          |
| PLC                               | na                     | 3,056          | 3,814          |
| SURE                              | 1,200                  | na             | na             |
| Other                             | 256                    | 500            | 500            |
| Total nps amber                   | 7,643                  | 12,011         | 12,498         |
| Included in AMS (URAA)            | 0                      | 2,920          | 3,035          |
| De minimis                        | 7,643                  | 9,090          | 9,463          |
| <b>Total reported AMS</b>         | 4,824                  | 5,733          | 5,554          |
| Total de minimis                  | 8,165                  | 9,206          | 9,669          |
| <b>Total Support</b>              | 12,989                 | 14,938         | 15,222         |

Note: 2011 is the most recent U.S. notification

**Table 4—Proportion of Outcomes Exceeding URAA Limits**

| <b>Item</b>     | <b>Average AMS<br/>(Million dollars)</b> |                | <b>Proportion of outcomes<br/>exceeding URAA limit at least<br/>once over period (%)</b> |                |
|-----------------|--|----------------|--|----------------|
|                 | <b>2014-18</b>                           | <b>2014-23</b> | <b>2014-18</b>   | <b>2014-23</b> |
| <b>Base</b>     | 5,733                                    | 5,643          | 51.6   | 72.6           |
| <b>100% PLC</b> | 7,188                                    | 7,712          | 62.0   | 84.4           |
| <b>100% ARC</b> | 2,891                                    | 2,715          | 1.8  | 2.6            |

**Table 5—Proportion of Outcomes Exceeding Proposed Doha Limits**

| Support          | Average 2014-23<br>Mil dollars | Proposed limit<br>Mil dollars | Proportion of outcomes<br>exceeding limit at least<br>once over 2014-23 |
|------------------|--------------------------------|-------------------------------|---|
| AMS              | 3,063                          | 7,641                         | 34.0  |
| Blue box         | 4,842                          | 4,773                         | 98.6  |
| OTDS             | 15,080                         | 14,467                        | 99.8  |
| Product specific |                                |                               |   |
| Amber box        |                                |                               |   |
| Barley           | 2                              | 29                            | 20.8  |
| Corn             | 48                             | 1,142                         | 10.8  |
| Upland cotton    | 587                            | 1,113                         | 69.4  |
| Dairy            | 526                            | 4,4671                        | 3.4   |
| Oats             | 0                              | 10                            | 0.8   |
| Peanuts          | 30                             | 249                           | 33.8  |
| Rice             | 0                              | 311                           | 0.0   |
| Sorghum          | 1                              | 44                            | 8.8   |
| Soybeans         | 37                             | 1,162                         | 7.6   |
| Sugar            | 1,485                          | 1,100                         | 100.0   |
| Wheat            | 27                             | 271                           | 19.2  |
| Blue box caps    |                                |                               |   |
| Barley           | 531                            | 32                            | 100.0   |
| Corn             | 1,931                          | 2,360                         | 98.6  |
| Upland cotton    | na                             | 1,009                         | na  |
| Oats             | 5                              | 5                             | 97.8  |
| Peanuts          | 100                            | 150                           | 99.4  |
| Rice             | 143                            | 235                           | 94.4  |
| Sorghum          | 227                            | 107                           | 100.0   |
| Soybeans         | 678                            | 200                           | 100.0   |
| Wheat            | 1,150                          | 1,041                         | 98.8  |

Figure 1  
Proportion of outcomes exceeding URAA commitments

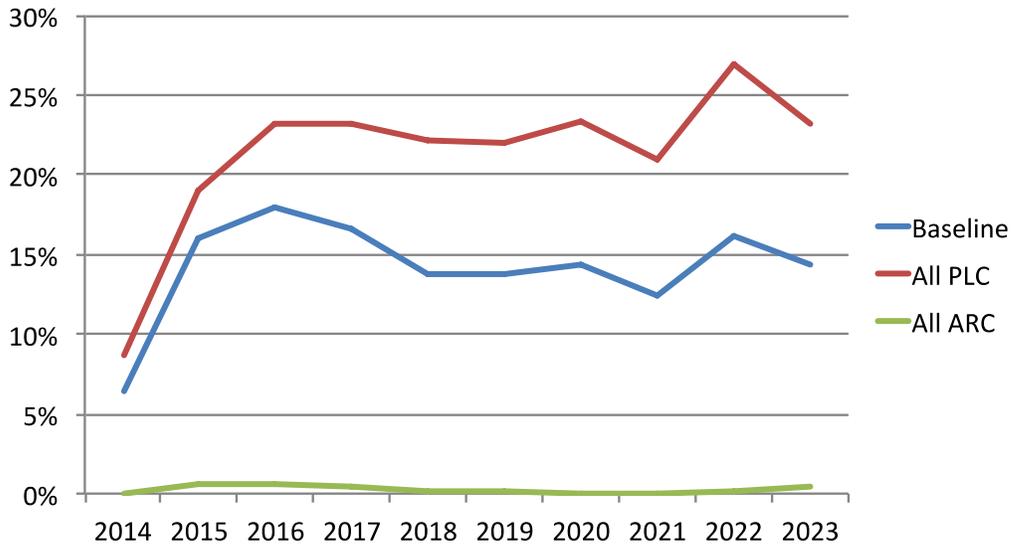


Figure 2  
Proportion of outcomes exceeding Doha commitments

