

March 7, 2025

The Honorable Robert F. Kennedy
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

The Honorable Brooke Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Dear Secretary Kennedy, Secretary Rollins, and Administrator Zeldin,

As organizations representing the food and agriculture community, we write to express our interest in working with you and the Make America Healthy Again Commission in advancing our shared goals of improving health outcomes for Americans while protecting our most vulnerable populations. At the same time, we are eager to share with the Commission our significant concerns regarding unfounded criticisms levied against the safety of the food and agricultural value chain. It is essential that as these topics are reviewed, the Commission respects and reinforces the robust science- and risk-based regulatory systems to which products are already subject and the abundance of fit-for-purpose scientific literature on these matters. We urge the Commission to draw conclusions from the significant body of sound, quality science and data while resisting policy changes based on misleading or outlier studies.

The February 13, 2025, executive order, *Establishing the President's Make America Healthy Again Commission*, referenced several items important to our organizations. Modern agricultural tools like pesticides and biotechnology are critical components of a healthy and dynamic food system and farm economy. U.S. produced food and feed ingredients are the foundation of a safe and affordable food supply for all Americans.

Pesticides are used in all types of agricultural production, from conventional to organic. These products are critical for ensuring a safe, abundant, and affordable supply of food, feed, fuel, and fiber. Without access to safe, well-regulated pesticidal tools, our nation's growers and agricultural producers would be vulnerable to devastating insects, fungal diseases, and weed pests that can completely destroy a crop. Economy-wide, this would impact the cost and availability of food for American consumers. Further, pesticides are vital for protecting public health from diseases carried by animal pests like bed bugs, rodents, and mosquitoes, which can carry diseases like West Nile virus or Dengue Fever. Leveraging the safe use of pesticides is also critical to supporting soil health conservation practices such as no-till; controlling weeds that could damage critical infrastructure; and controlling vegetation that contributes to wildfire fuel loads. Without risk-based scientific regulatory processes providing for access to and safe use of pesticides, U.S. growers and producers will become less competitive in the marketplace. Less U.S. production means Americans will increasingly rely on other countries for our food, leading to higher prices, reduced food security and compromised national security. A nation that chooses not to feed itself is not secure.

Importantly, in 1996 Congress enacted the *Food Quality Protection Act* (FQPA), which directs that there must be "reasonable certainty" no harm will result from pesticide residue exposures, with explicit emphasis placed on protecting infants and children. In implementing FQPA—which EPA completed in

2006 and periodically reviews—the agency regularly uses one or more safety factors, including a default “10x factor.” This means residue limits are very low risk and consistently set 10 or even 100 times more conservative than is already found to be safe. These limits are established using a variety of literature sources that EPA’s scientists independently determine are fit for regulatory purposes. In testing for residues, USDA and FDA annually find that more than 99% of food and feed products comply with these exceptionally conservative standards. As a result, the U.S. regulatory process is the global gold standard for ensuring the public is protected from pesticide residues.

Similarly, the U.S. has in place appropriate, science-based processes for regulating products of biotechnology and genetic improvement technologies. In recent decades, these innovations have helped farmers reduce crop input use; mitigate pest pressures; enable soil health practices, such as no-till; and enhance the nutritional profile of foods to improve health outcomes for consumers. Biotechnology has also been crucial in allowing farmers around the world to increase yields on existing farmlands to feed a growing global population, reducing the need to convert environmentally-sensitive lands (e.g., forests) into cropland for food production. Additional research is underway exploring ways to use genetic innovations to reduce food spoilage and waste, improve drought tolerance, among many other important developments.

USDA regulates biotechnology innovations to ensure they are safe for environmental release and do not pose a plant pest risk, while FDA evaluates new plant varieties produced using biotechnology to ensure they do not pose a food or feed safety risk. EPA also reviews biotechnology varieties intended to protect crops from pests to ensure they are safe for human health and the environment. Both long-term and short-term risks are evaluated in these assessments. Further, many of our trade partners evaluate biotechnology products to ensure compliance with safety standards around the world. In the more than 30 years since their initial agricultural uses, products of biotechnology are now safely grown globally on nearly 500 million acres each year to help meet food, feed, fuel, and fiber needs.

It is also essential to note that the U.S. has in place a robust regulatory process for ensuring the safety of food and animal feed ingredients. The *Federal Food, Drug, and Cosmetic Act (FD&C Act)* gave FDA the authority to oversee food safety and approve ingredients and additives for human and animal consumption. The FD&C Act has been updated by Congress numerous times, most recently in 2024. Through the authority granted by this legislation, FDA establishes regulations for food and animal feed labels, ingredients, and additives that are generally recognized as safe (GRAS) or approved additives. Importantly, FDA requires that the safety of GRAS ingredients and food and animal feed additives must be science-based and meet FDA safety standards. Much like the oversight of agricultural tools, there must be a “reasonable certainty” that these food and animal feed additives and ingredients do not harm consumers.

A domestic value chain for U.S. food products is the most efficient way to ensure continued access to safe, affordable food products. Limiting GRAS ingredients and additives due to dubious studies that do not meet appropriate data quality standards could lead to food shortages, limited options for consumers with dietary or religious food restrictions, intensified food waste, and increased imported food ingredients that would both spike costs and decrease food safety certainty.

While we welcome the administration’s focus on improving human health and the rigor of our regulatory systems, any reviews of these processes, or the products they regulate, must carefully consider the breadth and quality of scientific literature available on these topics. Reviews must also ensure necessary safeguards to protect scientific integrity. Too often, critics of modern agricultural production have singled out and relied on outlier studies that support their policy agendas, ignoring the strong consensus of available scientific evidence. They also have contorted screening level studies, such as those that feed

test animals hundreds or thousands of times above the acceptable daily intake limits for humans, as a justification to ban substances. Sometimes they have gone as far as to design their own studies to obtain a predetermined outcome, such as selecting test animals genetically predisposed for health ailments. Regulatory agencies have data quality standards and protocols in place to screen out poor studies and ensure others are used appropriately. It is essential that agency scientists and experts retain the autonomy needed to determine the appropriateness of data considered in science- and risk-based regulatory systems.

Our organizations support and share in the goal of improving health outcomes for Americans, but it is vital that any review efforts of the Commission or individual participant agencies are based on quality data and accept the strong scientific consensus on these topics. Further, any assessments must acknowledge the robust science- and risk-based processes our regulatory agencies already have in place and the extensive history of safe use that has resulted therefrom. Failing to maintain these indispensable standards is regrettably likely to result in Americans becoming less healthy. It risks not only harming our nation's growers, producers, and food processors, but also the consumers we proudly serve.

We look forward to future dialogues with the Commission as we collectively seek to improve health outcomes in the U.S. and thank you for your attention to this important matter.

Sincerely,

Agribusiness Association of Iowa
Agribusiness Association of Kentucky
Agribusiness Council of Indiana
Agricultural Council of Arkansas
Agricultural Retailers Association
Alabama Soybean and Corn Growers Association
Alaska Farm Bureau
Almond Alliance
American Agri-Women
American Cotton Producers
American Dairy Coalition
American Farm Bureau Federation
American Feed Industry Association
American Horse Council
American Mushroom Institute
American Pistachio Growers
American Pulse Association
American Seed Trade Association
American Soybean Association
American Spice Trade Association
American Sugar Alliance
American Sugarbeet Growers Association
AmericanHort
Aquatic Ecosystem Restoration Foundation
Aquatic Plant Management Society
Arizona Cotton Growers Association
Arizona Crop Protection Association
Arizona Farm Bureau Federation
Arkansas Certified Crop Advisers

Arkansas Crop Protection Association
Arkansas Farm Bureau Federation
Arkansas Rice Federation
Arkansas Rice Growers Association
Arkansas Soybean Association
Association of Equipment Manufacturers
Big Horn Basin Beet Growers Association
Big Horn County Sugar Beet Growers Association
Biotechnology Innovation Organization
Burley & Dark Tobacco Producer Association
California Alfalfa & Forage Association
California Apple Commission
California Association of Wheat Growers
California Bean Shippers Association
California Blueberry Commission
California Cherry Growers and Industry Association
California Citrus Mutual
California Citrus Quality Council
California Cotton Ginners and Growers Association
California Farm Bureau
California Fresh Fruit Association
California Grain and Feed Association
California Pear Growers
California Seed Association
California Specialty Crops Council
California State Floral Association
California Tomato Growers Association
California Warehouse Association
California Wild Rice Advisory Board
Calorie Control Council
Can Manufacturers Institute
Cherry Marketing Institute
Chippewa Valley Bean Co. Inc
Colorado Association of Wheat Growers
Colorado Livestock Association
Colorado Nursery and Greenhouse Association
Colorado Potato Administrative Committee
Colorado Sugarbeet Growers Association
Corn Refiners Association
Council of Producers & Distributors of Agrotechnology
CropLife America
Delaware Farm Bureau
Delta Council
Edible Oil Producers Association
Enzyme Technical Association
Farm Credit Council
Florida Farm Bureau Federation
Florida Fertilizer & Agrichemical Association
Florida Rice Growers
Georgia Cotton Commission

Georgia Fruit and Vegetable Growers Association
Georgia Green Industry Association, Inc.
Georgia Urban Ag Council
Georgia-Florida Soybean Association
Great Plains Canola Association
Hawaii Crop Improvement Association
Hawaii Farm Bureau
Idaho Eastern Oregon Seed Association
Idaho Farm Bureau Federation
Idaho Grain Producers Association
Idaho Mint Growers Association
Idaho Oilseed Commission
Idaho Onion Growers' Association
Idaho-Oregon Fruit and Vegetable Association
Illinois Corn Growers Association
Illinois Farm Bureau
Illinois Fertilizer and Chemical Association
Illinois Soybean Association
Independent Bakers Association
Independent Professional Seed Association
Indiana Corn Growers Association
Indiana Farm Bureau
Indiana Soybean Alliance
International Food Additives Council
International Fresh Produce Association
International Maple Syrup Institute
Iowa Corn Growers Association
Iowa Farm Bureau
Iowa Soybean Association
Kansas Agribusiness Retailers Association
Kansas Association of Wheat Growers
Kansas Corn Growers Association
Kansas Cotton Association
Kansas Farm Bureau
Kansas Soybean Association
Kentucky Corn Growers Association
Kentucky Small Grain Growers Association
Kentucky Soybean Association
Louisiana Cotton & Grain Association
Louisiana Farm Bureau Federation
Louisiana Rice Producers' Group
Maine Farmers Coalition
Maine Potato Board
Malheur County Onion Growers Association
Michigan Agri-Business Association
Michigan Asparagus Association
Michigan Bean Commission
Michigan Bean Shippers
Michigan Corn Growers Association
Michigan Farm Bureau

Michigan Soybean Association
Michigan State Horticultural Society
Mid Atlantic Soybean Association
Midwest Council on Agriculture
Midwest Dry Bean Coalition
Midwest Food Products Association
Midwest Forage Association
Minnesota AgriGrowth
Minnesota Association of Wheat Growers
Minnesota Canola Council
Minnesota Corn Growers Association
Minnesota Crop Production Retailers
Minnesota Farm Bureau Federation
Minnesota Soybean Growers Association
Mint Industry Research Council
Mississippi Farm Bureau Federation
Mississippi Rice Council
Mississippi Soybean Association
Missouri Agribusiness Association
Missouri Corn Growers Association
Missouri Soybean Association
Montana Agricultural Business Association
Montana Farm Bureau Federation
Montana Grain Growers Association
National Agricultural Aviation Association
National Alfalfa & Forage Alliance
National Alliance of Independent Crop Consultants
National Association of State Departments of Agriculture
National Association of Wheat Growers
National Barley Growers Association
National Black Growers Council
National Christmas Tree Association
National Confectioners Association
National Corn Growers Association
National Cotton Council
National Council of Farmer Cooperatives
National Farmers Union
National Fisheries Institute
National Grain and Feed Association
National Oilseed Processors Association
National Onion Association
National Pasta Association
National Pecan Federation
National Potato Council
National Seasoning Manufacturers Association, Inc. (NSMA)
National Sunflower Association
National Watermelon Association
NEBCO Sugar Beet Growers
Nebraska Agri-Business Association
Nebraska Farm Bureau Federation

Nebraska Soybean Association
Nebraska Sugarbeet Growers Association
Nevada Farm Bureau Federation
New Jersey Farm Bureau
New York Corn & Soybean Growers Association
New York Farm Bureau
New York State Agribusiness Association
North American Blueberry Council
North American Millers' Association
North Carolina Cotton Producers Association
North Carolina Farm Bureau
North Carolina Grange
North Carolina Potato Association
North Carolina Soybean Producers Association
North Central Weed Science Society
North Dakota Corn Growers Association
North Dakota Grain Growers Association
North Dakota Soybean Growers Association
Northharvest Bean Growers Association
Northeast Agribusiness & Feed Alliance
Northeast Dairy Producers Association
Northeastern Weed Science Society
Northern Canola Growers Association
Northern Pulse Growers Association
Ohio AgriBusiness Association
Ohio Corn & Wheat Growers Association
Ohio Farm Bureau
Ohio Soybean Association
Oklahoma Agribusiness Retailers Association
Oklahoma Cotton Council
Oklahoma Farm Bureau
Oklahoma Soybean Association
Oklahoma Wheat Growers Association
Olive Growers Council of California
Oregon Dairy Farmers Association
Oregon Farm Bureau
Oregon Potato Commission
Oregon Seed Council
Oregon Wheat Growers League
Oregon Women for Agriculture
Oregonians for Food and Shelter
Pacific Northwest Canola Association
Pacific Seed Association
Peanut and Tree Nut Processors Association
PennAg Industries Association
Pennsylvania Farm Bureau
Plains Cotton Growers, Inc.
Potato Growers of Michigan, Inc
Refrigerated Foods Association
Rhode Island Farm Bureau Federation

Rolling Plains Cotton Growers
Snake River Sugarbeet Growers Association
South Carolina Corn and Soybean Association
South Carolina Farm Bureau
South Dakota Agri-Business Association
South Dakota Corn Growers Association
South Dakota Farm Bureau
South Dakota Soybean Association
South Texas Cotton & Grain Association
Southern Crop Production Association
Southern Kansas Cotton Growers Coop
Southern Weed Science Society
Specialty Soya and Grains Alliance
Tennessee Corn Growers Association
Tennessee Farm Bureau Federation
Tennessee Nursery & Landscape Association
Tennessee Soybean Association
Texas Corn Producers Association
Texas Farm Bureau
Texas International Produce Association
Texas Rice Producers Legislative Group
Texas Soybean Association
Texas Wheat Producers Association
The Breakthrough Institute
The Fertilizer Institute
The Good Food Institute
U.S. Apple Association
U.S. Canola Association
U.S. Durum Growers Association
U.S. Hop Industry Plant Protection Committee
U.S. Peanut Federation
US Dry Bean Council
US Pea & Lentil Trade Association
USA Dry Pea & Lentil Council
USA Rice
Utah Farm Bureau Federation
Venture Dairy Cooperative
Virginia Agribusiness Council
Virginia Farm Bureau
Virginia Grain Producers Association
Virginia Peanut Growers Association
Virginia Soybean Association
Washington Association of Wheat Growers
Washington Farm Bureau
Washington Friends of Farms and Forests
Washington Mint Growers Association
Washington Policy Center Office for Agriculture Research
Washington Potato & Onion Association
Washington State Potato Commission
Weed Science Society of America

Western Alfalfa Seed Growers Association
Western Growers
Western Plant Health Association
Western Pulse Growers Association
Western Society of Weed Science
Western Sugar Cooperative
Western Tree Nut Association
Wheatland Beet Growers Association
Wisconsin Agri-Business Association
Wisconsin Dairy Products Association
Wisconsin Potato & Vegetable Growers Association
Wisconsin Soybean Association
Wyoming Ag Business Association
Wyoming Farm Bureau Federation
Wyoming Wheat Growers Association