

August 1, 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 Lee Zeldin Administrator U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20004 The Honorable Brooke Rollins Secretary U.S. Department of Agriculture 1400 Independence Avenue, S.W. Washington, D.C. 20250

Dear Secretary Kennedy, Secretary Rollins, and Administrator Zeldin:

The American Farm Bureau Federation, the nation's largest general farm organization with nearly 6-million-member families throughout all 50 states and Puerto Rico, is pleased to share the below policy recommendations for your consideration ahead of the "Make Our Children Healthy Again Strategy" set to be released by August 12. These are intended to build upon the conversations and correspondence we have had with you and other MAHA Commission leaders over the past several weeks.

Each recommendation can directly and positively improve the American farmer's ability to meet the needs of a healthy America, and we hope you take them into consideration for the incoming report. We share in your willingness to bolster domestic production of healthy and nutritious foods and look forward to ongoing and direct engagement with your team.

Advance American Innovation and Sustainability

Farmers and ranchers are doing more with less. They are growing healthy and nutritious food to ensure we always have stocked grocery shelves at home and abroad. Farmers need access to all tools in the toolbox to help produce their crops. To help facilitate innovation and support important technology for farmers, we suggest that the Commission focus on these policies:

- Promote the adoption of precision application technologies. These tools help farmers optimize
 the inputs they require on their crops, which supports cost efficiencies and reduces
 environmental footprints.
- Dedicate funding to improve mechanization and automation in agriculture. This is not a short-term solution, but it could set farm families up for long-term competitiveness.
- Support plant biostimulants and biologicals as promising tools that can conserve soil health and improve water quality. An established federal definition for plant biostimulants and a predictable, science- and risk-based framework for their assessment would help advance their adoption and accessibility for farmers.
- Initiate a thoughtful and iterative public comment process to solicit stakeholder and farmer feedback from all regions, climates, commodities, and production practices on shared understandings of regenerative agriculture. American Farm Bureau's grassroots-member

developed policy defines regenerative agriculture as "any production system that minimizes environmental impacts, maximizes production, and increases the productivity of soil over time." It is important to note that many important regenerative agriculture practices, such as reduced or no-till or the use of cover crops, rely on safe and effective agriculture innovations. It is also important to understand that different regions, climates, and commodities require different practices.

Smart Regulatory Reform and Program Enhancements to Support Farmers and Ranchers

We agree with President Trump's aggressive efforts to pursue smart deregulation. There are many areas in which federal regulations and actions have hampered innovation and squeezed farm families out of business. We suggest the Commission focus on these policies to support deregulatory efforts that will lift up farmers and ranchers:

- Solve the labor crisis in agriculture by utilizing timely administrative actions to rescind onerous U.S. Department of Labor rulemakings and exerting presidential pressure on Congress to provide a durable and modernized solution. Fruit and vegetable production is inherently labor-intensive, meaning a stable workforce is critical to domestic production of these nutritious foods. This solution must include a pathway to legal work authorization for farmworkers and critical improvements to guestworker programs.
- Protect our domestic markets from being flooded by imported foods, especially fruits and vegetables. Domestic growers are often undercut in their own marketing windows by foreign product that may not be subject to the same regulatory rigors.
- Exhibit a stronger commitment to inspection of imported product to ensure the high quality and safety standards in the United States. This must include higher rates of inspection, increased funding for inspections, and adoption of efficient security technologies that safeguard against pests, diseases, and adulterated product.
- Remove barriers to the farm safety net by improving the timeliness of delivery systems to farmers and ranchers, expanding access to farm safety programs for young and beginning farmers (especially those who grow fruits and vegetables), and supporting affordability and viability of crop insurance for fruit and vegetable growers.
- Strengthen food safety by enforcing standards of identity and streamlining the food safety system to minimize duplication, reduce audits, and bolster USDA's role in food safety oversight.
- Reintroduce whole milk into school meal programs. Enhance incentives for public programs to prioritize domestically grown foods.
- Implement a block grant or similar program for schools, food banks and food access networks to directly purchase specialty crops from local farmers.
- Support programs to encourage processing and marketing opportunities for direct-to-market producers. Infrastructure, workforce development and local processing capacity need to be expanded as this market demand has increased exponentially.

Public Investments in Agricultural Research

Agricultural research is critical to the success of America's farmers and ranchers, but the U.S. is sadly underperforming with investment in this area compared to other countries. For several decades, China has been outspending the United States in public agricultural research and development twofold. Even the European Union is dedicating more public research dollars to agriculture than the U.S. We suggest the Commission focus on these policies to help turn this tide:

• Invest in USDA agencies focused on research, including:

- o <u>Agricultural Research Service</u>: USDA's principal in-house research agency. ARS research projects help inform farmers and ranchers.
- o <u>National Institute of Food & Agriculture</u>: Provides funding for agricultural research, extension, and education activities through competitive grants.
- o <u>Economic Research Service</u>: Provides economic analysis and research that helps farmers better understand market conditions and trends so they can prepare and adapt.
- Invest in the IR-4 Project, which would help fruit, vegetable, and nut crop growers manage pests and diseases and produce more healthy crops.
- American agriculture, especially domestic fruit and vegetable production, relies on public research dollars to address pest and disease, enhance food safety, and develop effective conservation practices.

Pesticide Tools

Farmers face a lot of uncertainty from emerging pests and disease threatening their crops and livelihood. They require access to well-regulated and effective pesticide tools to protect their crops and deliver healthy and nutritious food to Americans. To help ensure farmers have the support they need to grow their crops free of pests and disease, we suggest the Commission focus on these policies:

- Reiterate the robust science- and risk-based pesticide regulatory process administered by EPA's Office of Pesticide Programs (OPP) and support the work of EPA Administrator Zeldin to make process and IT improvements within OPP to reduce the backlog of pesticides to deliver new, innovative tools to American farmers in a timelier manner.
- Support robust resources for vital pesticide regulatory offices and programs, including sufficient Congressional funding for EPA's OPP and USDA's Office of Pest Management Policy; additional support for USDA's Pesticide Data Program, which provides essential residue data for risk assessments and global trade; and funding for state pesticide programs, which serve as coregulators and provide applicator training, certification, and compliance oversight.

Conclusion

Farmers are central to a healthy America, and we appreciate the opportunity to share these policy recommendations that can directly and positively improve the American farmer's ability to meet the needs of a healthy America. We hope that you take these recommendations into consideration in your upcoming report.

We are grateful for your public service and welcome your partnership in advancing policies that enhance the health and success of Americans, including our farmers.

Sincerely.

Zippy Duvall,

President

cc: Vince Haley, Director, White House Domestic Policy Council
Dr. Heidi Overton, Deputy Director, White House Domestic Policy Council
Calley Means, Senior Advisor for MAHA, White House
Jim Goyer, Director, White House Office of Public Liaison