

November 24, 2021

The President  
The White House  
Washington, DC 20250

Dear Mr. President:

Thank you for your leadership in addressing challenges facing America's supply chains. The COVID-19 pandemic and subsequent surge in consumer demand has resulted in major supply chain disruptions that are dramatically impacting food and agricultural production. To ensure that America's farmers can continue to reliably deliver high-quality, cost-effective products to domestic and global consumers, more needs to be done to overcome the current supply chain challenges facing agriculture. Addressing these needs requires a holistic approach that includes both short- and long-term actions in the areas of transportation, labor, and regulation that can make a meaningful difference in expanding supply chain capacities and minimizing disruptions.

On behalf of the farmers, ranchers, stakeholders, and agribusinesses that we represent, we offer the following recommendations on immediate policy actions that can be taken to provide both short- and long-term relief:

### **Improving Transportation Capabilities**

#### *Trucking*

- Provide additional relief from current DOT Hours-of-Service requirements for truckers;
- Increase truck weight limits by allowing 91,000-lb., six-axle vehicles on federal interstate highways;
- Authorize a 10-percent axle weight tolerance to account for dry bulk shipment shifting during transport;
- Allow drivers under the age of 21 to get a commercial driver's license and operate on all state and federal roadways;
- Delay implementation of the Federal Motor Carrier Safety Administration's Entry Level Driver Training requirements at least two years;
- Increase the duration of the Farm-Related Restricted CDL program from 180 days to 270 days and automate the renewal process for this program.

#### *Rail*

- Increase competition among railroads by finalizing the long-pending proceeding on competitive switching;
- Finalize the Final Offer Rate Review and Rail Rate Arbitration proceedings to provide shippers the ability to challenge unreasonable rail rates when there is insufficient competition;

- Direct the DOT to either accept Petition No. P-1678 or reclaim authority delegated to the Association of American Railroad's Tank Car Committee to institute reforms that ensure a realistic cost-benefit analysis for tank car regulations and pricing;
- Update rail service reporting requirements based on information the Surface Transportation Board is gathering on first-mile/last-mile rail service to minimize significant negative impacts when rail cars are not timely placed or picked up.

#### *Maritime*

- Work with business and labor leaders to extend the hours of operation at all ports to help reduce backlogs;
- Direct the U.S. Department of Justice to review the existing Shipping Act law to determine if the enforcement tools in that act can be activated to gain compliance with the other provisions of the act setting forth reasonable practices;
- Establish an inter-agency working group focused on facilitating agricultural exports;
- Sponsor initiatives that increase operational tempo among port authorities, terminal operators, labor, ocean carriers, shippers, and truckers, and gate operations;
- Encourage and support the expansion of dual transactions, to improve port efficiency, for motor carriers of all firm sizes;
- Provide federal support for deployment of port and national data-sharing portals, such as already developed by the Port of Los Angeles.

#### **Addressing Regulatory Barriers**

- EPA must avoid label changes that would cause significant seed and pesticide demand shifts that supply chains will be unable to accommodate in the short time remaining ahead of the 2022 growing season;
- EPA should develop and implement streamlined methods for allowing pesticide ingredient substitutions that do not impact the safety of the end products yet address supply chain shortages. These improvements could include:
  - Extending the authority for inert ingredient substitution beyond the current December 31, 2021 deadline;
  - fast-tracking amendments to the Confidential Statements of Formula;
  - allowing self-certification of inert ingredient substitutions;
  - allowing self-certification to support registration of alternate sources of active ingredients, followed by submission of routine supporting data.
- Provide emergency funding to USDA to address the backlog of health certificates needed for the export of animal-based products.

#### **Expanding Long Term Supply Chain Capacity**

- Provide tariff relief on critical agricultural inputs—including seed, feed and pesticide ingredients, and other important raw and finished agricultural materials;
- Work with international trading partners to remove export bans on agricultural inputs that restrict supply and negatively impact markets and farmers;

- Streamline the H2A application process to ensure timely arrival of guestworkers and take steps to eliminate barriers to the program;
- Support the funding and construction of the top 15 lock and dam projects identified by the Army Corps of Engineers in the 2020 Capital Investment Strategy (CIS).

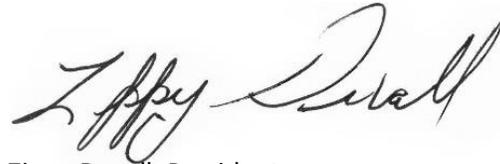
The majority of these actions can be addressed immediately by your Administration and would have a positive impact on food and agricultural production and delivery during the upcoming year. We encourage your Administration to act quickly to address these needed changes. We stand ready to meet with the leaders of your White House Supply Chain Task Force to provide additional background needed to implement any of these initiatives.

Thank you very much for your consideration.

Sincerely,



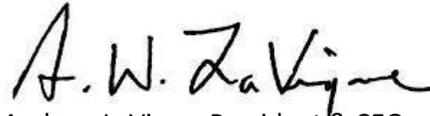
Daren Coppock, President & CEO  
Agricultural Retailers Association



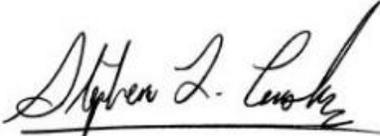
Zippy Duvall, President  
American Farm Bureau Federation



Constance Cullman, President & CEO  
American Feed Industry Association



Andrew LaVigne, President & CEO  
American Seed Trade Association



Stephen Censky, CEO  
American Soybean Association



Luther Markwart, Chairman  
American Sugar Alliance



Christopher Novak, President & CEO  
CropLife America



Julie Anna Potts, President & CEO  
North American Meat Institute



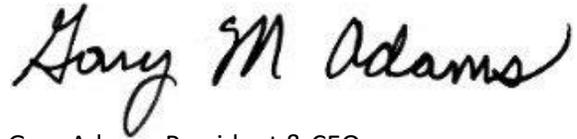
Ted McKinney, CEO  
National Association of State  
Departments of Agriculture



Chandler Goule, CEO  
National Association of Wheat Growers



Colin Woodall, CEO  
National Cattlemen's Beef Association



Gary Adams, President & CEO  
National Cotton Council



Michael J. Seyfert, President & CEO  
National Grain and Feed Association



Charles F. Conner, President & CEO  
National Council of Farmer Cooperatives



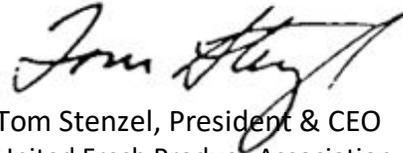
Jim Mulhern, President & CEO  
National Milk Producers Federation



Neil Dierks, CEO  
National Pork Producers Council



Corey Rosenbusch, President & CEO  
The Fertilizer Institute



Tom Stenzel, President & CEO  
United Fresh Produce Association



Elizabeth Ward, President & CEO  
USA Rice Federation

cc: The Honorable Thomas J. Vilsack  
The Honorable Gina Raimondo  
The Honorable Pete Buttigieg  
The Honorable Michael S. Regan