

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  
Connecticut Farm Bureau 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 Farm Bureau  
Kentucky Horticulture Council  
Kentucky Livestock Coalition  
Kentucky Sheep and Goat Development Office  
Kentucky Small Grain Growers Association  
Kentucky Soybean Association  
Kentucky State Horticultural Society  
Kentucky Vegetable Growers 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  
Northarvest 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