



March 6, 2018

Senator Pat Roberts, Chairman  
Senator Debbie Stabenow, Ranking Member  
Senate Committee on Agriculture, Nutrition and Forestry  
328A Russell Senate Office Building  
Washington, D.C. 20510

Representative Michael Conaway, Chairman  
Representative Colin Peterson, Ranking Member  
House Committee on Agriculture  
1301 Longworth House Office Building  
Washington, D.C. 20515

Dear Chairman Roberts, Chairman Conaway, Ranking Member Stabenow, and Ranking Member Peterson:

The Plant Based Foods Association (PBFA) was founded in March 2016 to promote the plant-based foods industry by removing obstacles to a fair and competitive marketplace for alternatives to animal ingredients and products. Our members range from small, innovative start-ups to large food companies, a few of which have been in operation for more than 100 years. In February, we hit a significant milestone when we added our 100<sup>th</sup> member.

The popularity of plant-based foods is outpacing traditional grocery, with sales of plant-based foods increasing 8.1 percent last year, compared to a slight decline in sales of all foods sold in the same channels. Whether for health, environmental or ethical reasons, plant-based alternatives to conventional meat and dairy products are going mainstream.

We appreciate the opportunity to provide input for the 2018 farm bill. Our overarching goal is to create a level playing field in the marketplace. As you begin deliberating the 2018 farm bill, we respectfully request that you consider inclusion of the following provisions.

#### Support for Specialty Crops

PBFA supports programs that benefit specialty crops. Many specialty crops are used as inputs to foods made by members of PBFA, chief among them being almonds, chickpeas and other pulses, coconut, flax, hemp, oats, and soybeans. USDA's 2018 Farm Bill & Legislative Priorities urges the committee to "foster market and growth

opportunities for specialty crop growers while reducing regulatory burdens that limit their ability to be successful.” We concur with the Secretary’s priorities and urge inclusion of provisions beneficial to specialty crops.

### Plant Protein and Nutrients of Concern

We support funding, through the National Institute of Food and Agriculture, of peer reviewed competitive grants to support agricultural research into plant proteins. Crop plants such as lentils, sorghum, chickpeas, fava beans, lupin, rice, oats, and water lentils should be explored for their protein content as well as more conventional inputs such as wheat, soy, and pea protein.

Additionally, we support the addition of references to “plant-based foods that are major sources of Nutrients of Concern” in 7 USC Section 3157 under “competitive special and facilities research grants” to include dry beans, dry peas, lentils and chickpeas. We urge the Committee to adopt report language to note that, under the Agriculture and Food Research Initiative, USDA has not approved adequate competitive grant research on pulse crops and products, including plant health and production, links between diet and health, bioavailability of nutrients, or ways to improve their functionality. We recommend that these important research priorities be addressed in AFRI grants under this statute.

### Removing Anti-Competitive Policies

PBFA supports subsidy reform to level the playing field to ensure a fair and competitive marketplace. Meat, egg, and dairy producers too often disproportionately receive subsidies that distort the market in their favor. PBFA supports reforms of subsidy programs that would bridge the large competitive gap between commodities and specialty crops. Specifically, we would like to see a cap on total commodity benefits, annual limits on agriculture risk coverage and price loss coverage, and a crop insurance framework that protects farmers and the taxpayer.

PBFA also urges the Committee not to include any provision to limit the use of descriptive terms such as milk, cheese, meat, or egg in food names that are not deceptive or misleading. Representatives of dairy intensive states have introduced legislation to limit the use of the terms such as milk, cheese, and yogurt. PBFA is sensitive to current challenges faced by the dairy industry. However, stifling innovation in the marketplace will not create additional markets for dairy products.

In addition, the commodity check-off programs that support the beef, egg, and dairy industries place the plant-based alternative industry at a competitive disadvantage. At a minimum, PBFA supports inclusion of provisions creating transparency and accountability in the federal checkoff programs. We support legislation (introduced by Senators Booker and Lee, and Representatives Brat and Titus) called The Opportunities for Fairness in Farming Act, which would:

- Clarify and fortify the prohibition on checkoff programs from contracting with organizations that lobby on agricultural policy;
- Establish program standards that prohibit anticompetitive behavior and engaging in activities that may involve a conflict of interest;
- Require transparency through publication of checkoff program budgets and expenditures and means for audits of compliance.

Additionally, we support Senator Lee's Voluntary Check-Off Program Participation Act, a bill that would give farmers and ranchers the freedom not to participate in USDA check-off programs. This is the best way to ensure a competitive marketplace.

### Support for Organic Crops

Lastly, PBFA supports the inclusion of the provisions of H.R. 3637, the Homegrown Organic Act of 2017, which would make modest changes to existing voluntary USDA conservation programs to assist producers who want to transition to organic. The bill would accomplish this by 1) removing a separate payment limit for the Environmental Quality Incentives Program Organic Initiative (EQIP-OI), which provides financial assistance to implement environmentally friendly conservation practices for organic producers. We were happy to note that this principle is aligned with Secretary Purdue's 2018 Farm Bill & Legislative Principles, to "encourage entry into farming through increased access to land and capital for young, beginning, veteran and underrepresented farmers." PBFA members use both organic and conventional ingredients. We have several members who would prefer to use only U.S. grown organic ingredients, such as tree nuts, but must currently source globally to secure an adequate supply.

PBFA and our members and partner organizations look forward to working with Congress to craft a farm bill that recognizes and supports innovation and positive changes in how Americans eat, while also leveling the playing field for plant-based foods and fostering an open marketplace for all. Please let us know if we can be of assistance to you, your staff, or other Members of the Committee as you endeavor to craft a farm bill that benefits farmers, consumers, and everyone in between.

Sincerely,

Michele Simon  
Executive Director  
Plant Based Foods Association

Jaime Athos  
Chair, Board of Directors  
Plant Based Foods Association