December 6, 2017

Via E-Mail

The Honorable Pat Roberts
Chairman of the Senate Agriculture Committee
United States Senate

Subject: Biostimulant Language

Dear Chairman Roberts:

On behalf of the U.S. Biostimulant Coalition (USBC), the Biological Products Industry Alliance (BPIA), the American Seed Trade Association (ASTA), the Biotechnology Innovation Organization (BIO) and the Humic Products Trade Association, we write in support of the efforts of the House Agriculture Committee to help advance legislation, which will provide regulatory clarity for the biostimulant industry. This much needed regulatory clarity will help growers, the biostimulant industry, agricultural retailers, state regulatory officials, and other stakeholders.

For background on "plant biostimulants", plant biostimulants are a substance or substances and/or micro-organisms whose function when applied to seeds, plants or the rhizosphere is to stimulate natural processes to enhance/benefit nutrient uptake, nutrient efficiency, tolerance to abiotic stress, crop quality and/or yield. These products improve agricultural sustainability and soil health. They have the ability to: enhance plant growth and development; improve the efficiency of plant nutrients, as measured by either improved nutrient uptake or reduced nutrient losses to the environment, or both; and/or act as soil amendments, with demonstrated ability to help improve soil structure, function or performance and thus enhance plant response.

The biostimulant industry is active, growing quickly and expected to become a ~2 billion dollar market by 2020. Innovation and new product development is expanding at a considerable rate by large, medium and small companies. These naturally derived products can be used for conventional and organic crop production.

As we have noted, the need for regulatory clarity for the affected industry and government regulatory groups is at a tipping point. Our request is that Congress, through the Farm Bill, authorize an interagency study, led by the Secretary of Agriculture, to identify potential regulatory and legislative reforms to ensure the expeditious and appropriate review, approval, uniform national labeling, and availability to American growers of valuable plant biostimulant products and shall report the findings and recommendations of the study to the President and the Congress.

As part of this effort, our industry desires the adoption of a formal definition for "plant biostimulant" and recognition, through a USDA led soil amendment study, of the benefits of plant biostimulants. We strongly believe that these regulatory clarifications and studies will greatly improve the understanding and adoption of the use of plant biostimulants, which will benefit growers, consumers and the environment. Finally, we believe the Environmental Quality Incentives Program (EQIP), should recognize the use of plant biostimulants as a best management practice that will help growers improve nutrient management issues. Our language is attached.

We are mindful of the pressures you and your colleagues face during the Farm Bill process, but we believe our request is very much aligned with the Administration's various deregulatory Executive Orders and other initiatives to lessen the regulatory burden on U.S. businesses. We believe that regulatory clarity will help the industry grow and create more jobs throughout the U.S.

Please let us know if you have any questions or comments.

Sincerely,

Andrew LaVigne, President and CEO, American Seed Trade Association (ASTA)
David Beaudreau Jr., Executive Director, US Biostimulant Coalition (USBC)
Keith Jones, Executive Director, Biological Products Industry Alliance (BPIA)
James C. Greenwood, President and CEO, BIO
Russell Taylor, President, Humic Products Trade Association (HPTA)