



May 16, 2025

Secretary Robert F. Kennedy, Jr.  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Secretary Brooke Rollins  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250

Administrator Lee Zeldin  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Secretary Kennedy, Secretary Rollins, and Administrator Zeldin:

The Biological Products Industry Alliance (BPIA) is the leading voice for companies advancing innovation in biological solutions for pest management, crop enhancement, and sustainable and regenerative agriculture. Our membership includes more than 175 companies—ranging from small businesses to multinational organizations—employing thousands of workers in research, manufacturing, distribution, and support services across the United States.

As national conversations elevate the importance of the Make America Healthy Again (MAHA) Initiative—through improved nutrition, environmental stewardship, and accessible innovation—biological products represent a science-based complement to both American agriculture and public health. These tools, including biopesticides, biofertilizers, and biostimulants, support soil health, crop resilience, and regenerative and sustainable productivity. By expanding the range of available solutions, biological products help farmers meet the growing demand for responsibly produced food. Typically, biological products are of low or no risk and toxicity to humans and the environment and, in most

instances, are exempt from the requirement of a food tolerance and can facilitate the reduction of pesticide residues on food, feed, and fiber. Their role in modern agriculture is foundational to strengthening food systems, revitalizing rural economies, and advancing the environmental and public health goals at the heart of MAHA.

The economic impact of the biological products sector is both substantial and expanding. According to a 2023 Global Biocontrol Market Report, the global biologicals market is expected to exceed \$15 billion by 2029. The U.S. is a primary driver of this growth and creates rewarding jobs in science and technology, research and development, manufacturing, logistics, and on-farm services—particularly in rural areas. Yet to maintain global leadership and unlock the full benefits of biological products, the U.S. must modernize regulatory systems, reduce barriers to adoption, and strengthen public-private coordination.

**We respectfully request your support on the following priorities that align directly with MAHA objectives:**

- **Address Product Approval Backlogs at EPA:** The Office of Pesticide Programs (OPP)—and specifically the Biopesticides and Pollution Prevention Division (BPPD)—continues to face a growing backlog of biological product submissions. For many years, BPPD processed, on average, 20–30 new products per year. However, in recent years, BPPD has experienced an almost three-fold increase in new product submissions. Biological products companies are now experiencing multi-year delays in product approvals. This backlog delays access to sustainable, low-risk pest and pathogen control solutions that farmers urgently need. Despite new accountability and efficiency measures in PRIA 5—including required third-party audits and timeline transparency—EPA continues to miss statutorily mandated deadlines. This regulatory uncertainty stalls U.S. innovation, limits investor confidence, and holds back tools essential for managing climate-resilient and regenerative agriculture.

For FY 2026, BPIA and the PRIA Coalition request \$166 million in appropriated funding for OPP, as required under PRIA 5. These resources are essential to handle the growing portfolio of biological products and fulfill the promise of timely and effective regulatory review. With both industry fees and congressional appropriations, it is critical the agency meets expectations for performance, efficiency, and public benefit.

- **Support the Bipartisan Plant Biostimulant Act:** Plant biostimulants are products that support crop resilience to abiotic stresses, such as heat and drought; improve nutrient uptake efficiency in crops; and support a healthy soil microbiome that supports plant health and vigor. These products are neither pesticides nor fertilizers, but their judicious use can promote plant and soil health while simultaneously reducing reliance on pesticides and synthetic fertilizers. The Plant Biostimulant Act is a bipartisan, science-driven bill that would establish a clear federal definition for plant biostimulants and direct USDA to coordinate with EPA and state regulators in establishing a clear path to market for plant biostimulants. Importantly, it excludes plant biostimulants from FIFRA, ensuring they are not inappropriately regulated as pesticides.

This clarity will reduce regulatory confusion, unlock private investment, and accelerate access to tools that improve soil health, nutrient efficiency, and crop resilience. It is important to note that other regions of the world that are highly competitive with the United States in both the agricultural and technology sectors, such as Europe and Brazil, have recently developed regulatory frameworks to support the commercialization of plant biostimulants. Without action, the United States risks slipping behind other countries in enjoying the benefits of one of the most rapidly growing sectors in agriculture today. With demand rising for regenerative agriculture, this bill helps position U.S. farmers and innovators at the forefront—while supporting MAHA’s goals of improved nutrition, environmental stewardship, and rural economic growth.

- **Ensure a Regulatory Pathway at APHIS for GE Microbes:** Following the vacatur of USDA’s SECURE Rule in 2024, the regulatory pathway for genetically engineered (GE) microbes has been thrown into uncertainty. These innovations—critical for nitrogen fixation, nutrient cycling, and crop resilience—are stuck in limbo without a clear review process at APHIS. We urge USDA to move quickly to develop a new science-based regulatory framework that supports innovation while protecting plant and environmental health. APHIS must also work in coordination with industry to ensure any future process is predictable, risk-based, and tailored to the unique characteristics of GE microbes.

- Promote Grower Adoption through Strategic Programs:** Accelerating the adoption of biological products by growers is essential for realizing the full benefits of these products—both agronomically and environmentally. Federal investment in public-private partnerships and deployment-focused initiatives is key. Programs like the Western Growers Association’s Platform<sup>10</sup> biopesticide evaluation initiative, a proposed FFAR IPM Alliance, and the USDA IR-4 Integrated Solutions Program serve as critical bridges—helping researchers, companies, and growers test, validate, and scale biological tools. Continued support for USDA NIFA and ARS integrated pest management research is also of critical importance to both the biologicals industry and U.S. agriculture. These initiatives reduce risk for farmers, farm workers, and consumers, speed time-to-market for new products, and ensure regional IPM priorities are met. Supporting and expanding these programs is central to advancing sustainable and regenerative agriculture and achieving MAHA-aligned outcomes in food security and public health.
- Reduce International Trade Barriers and Tariff Risks:** Biological products represent a rapidly growing global industry—but inconsistent regulations and tariffs can significantly impede U.S. competitiveness. Export barriers, including the lack of harmonized definitions or approval pathways in key markets like the EU, create bottlenecks for American innovators. Tariffs—whether imposed directly or as retaliation—disproportionately affect industries that rely on small and mid-sized companies, like biologicals. BPIA supports efforts to reform international pesticide regulations (e.g., through multinational organizations like CODEX, the FAO, IPPC and OECD) and direct engagement with the European Union on reforms under discussion to support the more timely and efficient approvals of biopesticides and biostimulants in Europe. We, the U.S.-based Biological Products Industry Alliance, continue to work closely with other trade associations including the EU-based International Biocontrol Manufacturers Association to improve market access for biologicals in this important region. We respectfully request your support for U.S. trade policies that help expand our industry's access to global markets. Regulatory diplomacy and smart tariff strategies can help ensure the United States remains a global leader in providing innovative, safe, sustainable crop solutions for the world.

With collaboration, strategic investment, and regulatory clarity, the U.S. can lead the way in transforming agriculture—strengthening rural economies, protecting the environment, and improving public health. These priorities are directly aligned with MAHA’s mission to foster healthier outcomes for American families and communities.

Thank you for your leadership. BPIA and its members welcome the opportunity to be a resource to you as we work together toward a more sustainable and health-focused agricultural future.

Sincerely,

**BIOLOGICAL PRODUCTS INDUSTRY ALLIANCE**

A handwritten signature in black ink that reads "Keith J. Jones". The signature is written in a cursive, flowing style.

Keith J. Jones  
Executive Director

CC: MAHA House Caucus: Co-chairs: Reps. Vern Buchanan (R-FL), John Joyce (R-PA), and Lloyd Smucker (R-PA): Reps. Brian Babin (R-TX), Troy Balderson (R-OH), Stephanie Bice (R-OK), Diana Harshbarger (R-TN), Nick Langworthy (R-NY), Laurel Lee (R-FL), David Rouzer (R-NC), Pete Stauber (R-MN) and William Timmons (R-SC).

CC: MAHA Senate Caucus: Lead: Sen. Roger Marshall (R-KS): Sens. Tommy Tuberville (R-AL), Rick Scott (R-FL), Cynthia Lummis (R-WY), and Ron Johnson (R-WI)