



August 26, 2025

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

SUBJECT: Request for Public Comment on USDA Reorganization ([SM 1078-015](#))

Dear Secretary, Rollins:

The Biological Products Industry Alliance (BPIA) appreciates the opportunity to provide comments on USDA's proposed reorganization plan. Representing more than 175 member companies, BPIA champions safe, effective, and environmentally responsible biological solutions—including biopesticides, biostimulants, and biofertilizers—used by both conventional and organic growers in the United States and globally. Our members includes manufacturers, distributors, suppliers, consultants, research organizations, and regulatory experts committed to advancing sustainable agriculture. BPIA members rely on USDA—particularly APHIS and its affiliated research facilities as well as AMS-NOP—for regulatory clarity, research support, and collaboration to bring new and innovative biological tools to growers.

COMMENTS ON THE USDA REORGANIZATION

MAINTAINING A STRONG WASHINGTON DC PRESENCE

HEADQUARTERS REGULATORY AND POLICY STAFF

Regulatory and policy staff for the APHIS Plant Protection and Quarantine (PPQ) and Biotechnology Regulatory Services (BRS) units are currently part of the USDA Headquarters staff based in Beltsville, Maryland. These units, comprised of regulatory and policy experts, are vitally important to maintaining safe, healthy, and vibrant agriculture while also providing guidance and regulatory surety to the agricultural product developers, many of whom are BPIA members. These key staff are critical to the design and development of the programs, regulations, and policies upon which BPIA companies rely. Their proximity to lawmakers and legislative staff on Capitol Hill as well as senior staff within APHIS and the broader USDA as well as other agencies, such as EPA, is necessary to ensure that the policies and regulations keep pace with the rapidly-developing emerging technologies in the agricultural product market including plant

biostimulants, RNA-interference, and engineered insects to name but a few. BPIA urges USDA to maintain the PPQ and BRS units in the Washington DC area.

Similarly, the policy staff in the AMS National Organic Program based in Washington DC are engaged in maintaining the USDA Organic standards that are highly valued the world over. The regulatory and policy initiatives needed to keep up with the changing requirements of the organic sector require constant interaction with the legislative committees, Congressional staff, and members of Congress, as well as related agencies to ensure that the USDA Organic Seal continues to be sought after and highly valued. BPIA strongly suggests that the Headquarters NOP office remain in Washington DC.

- BPIA engages directly with APHIS, USDA leadership, and other federal agencies on regulatory and research issues critical to biological products.
- Proximity and access to USDA staff in the Washington DC region ensures timely communication and effective collaboration with industry stakeholders.
- Spreading USDA's capacity too thinly across multiple regional offices risks weakening this engagement and slowing policy development.

DRIVING AGRICULTURAL RESEARCH AND DEVELOPMENT

USDA's agriculture research facilities are world-renowned and employ many preeminent researchers in the field. Beltsville, Maryland is home to the Beltsville Agricultural Research Center (BARC), comprised of more than 17 agricultural research laboratories across 6,500 acres, including the Invasive Insect Biocontrol and Behavior Laboratory (IIBBL), Bee Research, Systematic Entomology, Molecular Plant Pathology, Food Quality, Soybean Genomics, Mycology and Nematology, and others. These laboratories are uniquely positioned to address invasive species, pollinator health, plant genomics, food quality, and sustainable agriculture challenges in the Mid-Atlantic and Northeastern regions. Relocating or disaggregating these facilities would disrupt research continuity, weaken collaborations with local universities and industry, and undermine USDA's ability to respond to region-specific pest and plant health issues.

- BARC's work is central to the science base for biocontrol, biopesticide development, and pollinator health, areas directly relevant to BPIA's mission.

PRESERVING BIOLOGICAL RESEARCH & REGULATORY CAPACITY

IIBBL has delivered nationally recognized work on invasive pests such as brown marmorated stink bug, spotted lanternfly, spongy moth, and biting arthropod vectors of disease including black-legged ticks and mosquitoes. IIBBL provides a critical anchor for US leadership in biocontrol and biological innovation.

The proposed elimination of USDA's quarantine and biological control facility at the University of California, Riverside (UCR) would represent a significant setback for biological control research and innovation.

- UCR has long served as a hub for evaluating beneficial organisms under quarantine conditions and developing solutions for invasive pests affecting US agriculture.
- Similarly, uncertainty surrounding the future of the Beltsville Agricultural Research Center raises concerns for program continuity in biological research, regulatory science, and support for innovation.

ALIGNING REGIONAL STRUCTURE WITH AGRICULTURAL DEMAND

Loss or fragmentation of Beltsville programs would significantly weaken USDA's contributions to sustainable pest management, food security, and environmental health. BPIA strongly urges USDA to maintain its Washington DC presence, preserve core research facilities such as Beltsville and Riverside, and align regional offices with agricultural demand centers.

- USDA's plan to designate Utah as the closest new western regional office fails to reflect the realities of US agriculture.
- California—home to the nation's largest specialty crop sector and a leading state in biological product use and development—requires direct USDA support and infrastructure.
- Regional decisions should be aligned with agricultural demand centers to ensure resources meet the needs of growers and innovators.

CONCLUSION

BPIA values USDA's leadership in advancing agricultural innovation and safeguarding plant health. As the Department finalizes its reorganization, we strongly encourage (1) preserving USDA's Washington DC presence, including the policy and regulatory staff offices for APHIS PPQ and BRS and AMS-NOP; (2) maintaining critical APHIS research facilities like BARC and UCR; (3) ensuring continuity at Beltsville; (4) and aligning regional offices with the agricultural states they serve. Doing so will strengthen stakeholder engagement, preserve US leadership in biological innovation, and ensure USDA continues to meet the evolving needs of American agriculture.

Sincerely,

BIOLOGICAL PRODUCTS INDUSTRY ALLIANCE



Keith J. Jones
Executive Director