



November 7, 2025

The Honorable Dudley Hoskins
Under Secretary
Marketing and Regulatory Programs
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250
Dear Under Secretary Hoskins:

On behalf of the Biological Products Industry Alliance (BPIA), congratulations on your confirmation as Under Secretary for the U.S. Department of Agriculture's Marketing and Regulatory Programs (MRP). We look forward to your leadership in strengthening USDA's role in advancing innovation, sustainability, and market access across American agriculture.

BPIA represents over 175 manufacturers, marketers, distributors, and service providers of biological products committed to the development and adoption of safe, effective, and environmentally responsible biological solutions—including biopesticides, biostimulants, and biofertilizers—that support sustainable production across diverse agricultural systems. Through proactive collaboration with USDA and EPA, BPIA supports regulatory clarity and scientific advancement that help growers adopt biological tools to improve soil health, pest management, and productivity.

We value the productive engagement our members have with the agency under your purview and offer our continued partnership to advance shared goals.

Biotechnology Regulatory Services

BPIA appreciates the leadership of the Biotechnology Regulatory Services in its effort to implement a revised Part 340 framework, which has brought much-needed clarity to the regulation of modified plants. However, we encourage USDA to ensure that microbial

products—both engineered and naturally occurring—are appropriately addressed within the broader biotechnology oversight system.

Biological products represent a rapidly advancing area of innovation, and consistent, science-based regulatory pathways are essential for their responsible development and commercialization. We share BRS's commitment to maintaining environmental safeguards while fostering innovation, and we welcome opportunities to collaborate on establishing transparent guidance for microorganisms—including those reviewed under the voluntary process—to ensure they are recognized and supported under a new Part 340 framework.

Plant Protection and Quarantine

BPIA appreciates the continued engagement by the Plant Protection and Quarantine program with stakeholders and its dedication to improving the permitting process for microorganisms and other biologically based products. We value the progress made through recent business process improvement initiatives, which have increased transparency and reduced turnaround times for many applicants.

Looking ahead, we welcome opportunities to collaborate with PPQ on ways to further enhance clarity, consistency, and timeliness in the permitting process. BPIA members are particularly interested in supporting efforts to strengthen communication and coordination across state and federal levels, improve understanding of commercial permit expectations, and ensure that regulatory approaches remain risk-proportionate and predictable.

BPIA stands ready to continue partnering with PPQ to build on these improvements and ensure that innovation in biological solutions can advance efficiently while upholding USDA's high standards for safety and stewardship.

National Organic Program and the National Organic Standards Board

BPIA's engagement with the National Organic Program (NOP) and the National Organic Standards Board centers on advancing science-based standards for materials used in organic production. Biological products play a vital role in organic and regenerative systems, and BPIA regularly submits public comments to support consistent and transparent evaluation of biological inputs, including microbial pest control agents and soil health enhancers.

We appreciate USDA's openness to industry input and look forward to collaborating with the NOP to ensure that regulatory and market pathways for biological products remain aligned with organic integrity and innovation.

BPIA stands ready to serve as a resource to your office and to the MRP mission as you begin your tenure. We share USDA's commitment to supporting farmers, enhancing sustainability, and fostering public confidence in agricultural innovation.

Congratulations once again on your appointment. We look forward to continued collaboration with you and your team.

Sincerely,

Biological Products Industry Alliance

A handwritten signature in black ink, appearing to read "J. S. Dunmore", written over a light gray rectangular background.

John W. S. Dunmore
Director of Government & External Affairs