



November 1, 2021

Via Federal eRulemaking Portal: <http://www.regulations.gov>

Mr. Robert Ibarra
Commodity Credit Corporation
US Department of Agriculture
1400 Independence Avenue, SW
Washington DC 20250-0268

**SUBJECT: Docket No. USDA-2021-0010
Climate-Smart Agriculture and Forestry Partnership Program**

Dear Mr. Ibarra:

Please accept these comments from the Biological Products Industry Alliance (BPIA). BPIA is a trade association dedicated to fostering the use of safe, effective, and innovative biological technology including biopesticides, biostimulants, and biofertilizers in North America. These beneficial tools are used in commercial agriculture, forestry, gardens, golf courses, greenhouses, horticulture, ornamentals, and public health.

BPIA is encouraged by the new policies proposed to address climate change and conservation goals in the United States. As you begin to develop and implement the President's agenda, we look forward to working with you to ensure that American farmers are provided with all of the tools necessary to sustainably grow the food, fuel, and fiber needed to feed the world.

Biological products include agricultural and forestry products that improve natural plant nutritional processes, which can result in improved plant health; tolerance to abiotic and other environmental stresses; and improved overall growth, quality, and yield of crops. In doing so, biostimulant products specifically can increase the uptake and utilization of existing and applied nutrients, thus reducing the potential for off-farm nutrient runoff into rivers, lakes, and streams or loss to the atmosphere as greenhouse gasses. The utilization of innovative plant nutrition technologies, such as biofertilizers, plant biostimulants, and other sustainability management practices can be useful tools for enhancing carbon sequestration, conserving and replenishing soil health, reducing carbon emissions, and improving the nation's water quality¹.

The climate benefits of biological products is one of the many reasons why BPIA is working to establish a consistent and predictable regulatory path to market for plant biostimulant products in the United States. BPIA is working with other interested stakeholders in seeking support for the *Plant Biostimulant Act* which would enable the following:

¹ See Joint EPA-USDA Next Gen Fertilizer Challenge Project (<https://www.epa.gov/innovation/next-gen-fertilizer-challenges>)

- Ability to use the term “biostimulants” in commerce and education
- Clarity on appropriate product claims
- A clear, consistent, predictable process to market
- Consistent regulatory guidelines that could include criteria such as: efficacy, safety, and product composition.

In addition to regulatory clarity, the *Plant Biostimulant Act* would also request the Secretary of Agriculture to:

Conduct a study to assess the types of, and practices using plant biostimulants that best achieve the following—

- (1) increasing organic matter content;
- (2) reducing atmospheric volatilization;
- (3) promotion of nutrient management practices;
- (4) limiting or eliminating runoff or leaching of soil or nutrients such as phosphorus and nitrogen into groundwater or other water sources;
- (5) restoring beneficial bioactivity or healthy nutrients to the soil;
- (6) aiding in carbon sequestration, nutrient use efficiency and other climate-related benefits; and
- (7) supporting innovative approaches to improving agricultural sustainability, including the adoption of performance-based outcome standards and criteria.

(b) Not later than 1 year after the date on which funds are first made available for the study under subsection (a), the Secretary shall make publicly available and submit to the Committee on Agriculture of the House of Representatives and the Committee on Agriculture, Nutrition, and Forestry of the Senate a report that describes the results of the study.

Furthermore, the *Plant Biostimulant Act* would modify the Environmental Quality Incentive Program as follows:

SECTION 7. ENVIRONMENTAL QUALITY INCENTIVES PROGRAM.

Section 1240B(d) of the Food Security Act of 1985 (16 U.S.C. 3839aa–2) is amended by striking paragraph (3)(C) “nutrient management” and inserting “nutrient management, including the use of plant biostimulants;”.

In addition to what has been proposed in the *Plant Biostimulant Act*, BPIA requests that the Climate Smart Agriculture and Forestry Partnership Program pursue in-field research and life cycle analyses to evaluate the benefits that the use of biological products could provide in supporting key objectives, such as reducing greenhouse gas emissions, reducing fertilizer run-off and reducing the negative impacts of synthetic pesticides to pollinators.

BPIA believes increased use of biological products in agriculture and forestry can enhance the beneficial ecosystem services of agricultural systems and that the adoption and use of biological products in integrated crop and pest management programs should be central to any future ecosystem service-based incentives programs, as the Administration and Congress work with key agricultural, food, academic and environmental stakeholders to develop the *2023 Farm Bill*.

BPIA stands ready to provide resources and work alongside you in support of these and other federal regulatory and administrative actions which will help facilitate the ability of our industry to support American farmers in their mission to grow the world’s food in the most sustainable manner.

Thank you for your consideration.

Respectfully,

BIOLOGICAL PRODUCTS INDUSTRY ALLIANCE



Keith J. Jones
Executive Director