

October 25, 2021

On behalf of the undersigned organizations, we are writing to express our strong support for the Plant Biostimulant Act. We represent the plant biostimulant industry and affiliated stakeholders who work to encourage science-based research and innovation for enhancing nutrient use efficiency for farmers, as well non-agricultural users, across the nation and to advance policy and regulatory frameworks that increase biostimulant market access and encourage research and innovation. The plant biostimulant industry and affiliated stakeholders are encouraged by the policies proposed under the new administration to address climate smart agriculture and conservation goals in the United States.

Plant biostimulants are products that can be used in both agricultural and non-agricultural settings 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, plant biostimulant products can increase the uptake and utilization of existing and applied nutrients, thus reducing the potential for nutrient runoff into rivers, lakes, and streams or loss to the atmosphere as greenhouse gasses. The utilization of innovative plant nutrition technologies, such as enhanced efficiency fertilizers, plant biostimulants, and other sustainability management practices such as 4R Nutrient Stewardship, can be useful tools for enhancing carbon sequestration, conserving and replenishing soil health, reducing carbon emissions, and improving the nation's water quality.¹

Unfortunately, plant biostimulant products and technologies face several challenges that can hinder their uses in commercial agriculture, home gardens, turf, and ornamental applications, thus reducing the sustainability enhancements these products offer. Foremost among these challenges is the lack of a consistent and predictable path to market for plant biostimulant products in the United States. To address this situation, the plant biostimulant industry is working on the following key areas:

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

To help achieve these goals, the Plant Biostimulant Act will:

- Establish a uniform national definition for “plant biostimulant”;
- Require the U.S. Environmental Agency (EPA) to review and revise existing Code of Federal regulations to include this new plant biostimulant definition;
- Establish an intergovernmental plant biostimulant working group, comprised of representatives from the U.S. Department of Agriculture (USDA), EPA, and state

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

regulators to help determine the appropriate framework for plant biostimulant products, evaluate a pathway for a uniform process for regulation of these products and evaluate options for creating a uniform national label for plant biostimulant products;

- Require USDA to study how plant biostimulant products can contribute to soil health;
- Amend existing Environmental Quality Incentive Programs (EQIP) to include the use of plant biostimulant products under nutrient management plans; and
- Establish a plant biostimulant liaison that will be based within USDA to work in a facilitation/coordination role between USDA, EPA, and state regulators.

As Congress begins to consider the next farm bill, we believe the Plant Biostimulant Act will help achieve many of the above goals. We stand ready to provide resources and work alongside your offices in support of these and other federal actions that will help facilitate the ability of our industry to create better access to these products to end users who need them to sustainably grow the food, fuel, and fiber to feed a growing world and to protect and enhance the places we live, work, and play. .

Thank you for your consideration.

Respectfully,

Agriculture Retailers Association (ARA)
American Seed Trade Association (ASTA)
Biological Products Industry Alliance (BPIA)
Biostimulants Council (BC)
Biotechnology Industry Organization (BIO)
Council of Producers and Distributors of Agrotechnology (CPDA)
CropLife America (CLA)
The Fertilizer Institute (TFI)
Golf Course Superintendents Association of America (GCSAA)
Humic Products Trade Association (HPTA)
National Association of Landscape Professionals (NALP)
Responsible Industry for a Sound Environment (RISE)