

June 24, 2022

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”;
- Amend the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) to exclude plant biostimulants from being regulated under the Act;
- Establish a definition for nutritional chemical;
- Amend the definition for a vitamin hormone product;

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

- Require the U.S. Environmental Agency (EPA) to review and revise existing Code of Federal regulations to include this new plant biostimulant definition;
- Require USDA to study how plant biostimulant products can contribute to soil health.

As Congress begins to consider the next farm bill, we believe the Plant Biostimulant Act is the most logical place for inclusion and 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)
Biotechnology Innovation Organization (BIO)
Council of Producers and Distributors of Agrotechnology (CPDA)
CropLife America (CLA)
The Fertilizer Institute Biostimulant Council
Golf Course Superintendents Association of America (GCSAA)
Humic Products Trade Association (HPTA)
International Fresh Produce Association (IFPA)
National Association of Landscape Professionals (NALP)
Responsible Industry for a Sound Environment (RISE)
Western Growers