



# CALIFORNIA FARM BUREAU FEDERATION

## FEDERAL POLICY DEPARTMENT

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The Honorable Rodney Davis  
Chairman, Subcommittee on Biotechnology,  
Horticulture, and Research  
House Committee on Agriculture  
1301 Longworth House Office Building  
Washington, DC 20515

The Honorable Suzan DelBene  
Ranking Member, Subcommittee on  
Biotechnology, Horticulture, and Research  
House Committee on Agriculture  
1305 Longworth House Office Building  
Washington, DC 20515

**Statement of Paul Wenger  
President  
California Farm Bureau Federation  
to the  
U.S. House Agriculture Subcommittee On  
Biotechnology, Horticulture, and Research**

**Regarding  
The Farm Economy: Factors Impacting the Cost of Production  
April 27, 2016**

**For the Hearing Record**

**May 11, 2016**

Dear Chairman Davis, Ranking Member DelBene, and Subcommittee Members:

The California Farm Bureau Federation (CFBF) is California's largest farm organization, comprised of 53 county Farm Bureaus, representing over 53,000 farm families and individual members throughout the state's 56 counties. CFBF strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

CFBF appreciates the Subcommittee and Committee as a whole for the opportunity to provide input on *The Farm Economy: Factors Impacting the Cost of Production*. Modern agriculture's success depends on the availability of new technologies to help farmers grow more food, more sustainably, than ever before. Production costs are a key component of this success and a major factor affecting a farm operation's long-term viability.

Although there are many factors affecting the cost of farming operations, we would like to focus our comments on those associated with today's environmental regulations. Unfortunately, the impact of higher costs associated with pesticide regulations does not appear to be a consideration when it comes to implementing today's federal regulatory policies. If the U.S. Environmental Protection Agency (EPA) fails to adequately calculate and/or consider the economic costs of

these impacts and beneficial uses in its regulatory proposals, the consequences could be devastating.

By almost any measure, American agriculture is a success story. Farmers and ranchers are producing more food on less land and using more sustainable practices than ever before. In addition to the hard work and dedication of today's growers, a key reason for this success can be explained in one word: innovation. Agricultural research investment from both land-grant universities and science-based industries has enabled our productivity to rise to unprecedented levels.

However, modern agriculture's success is not appreciated by everyone. There are some who wish to drag our industry backwards, in a futile pursuit of a pristine image of farming that never existed. These groups represent only a small segment of our society, but they are vocal, influential, and frequently challenge the new technologies that come to agriculture. Unfortunately, these activists appear to have undue influence on EPA, especially when it comes to regulatory policies. All too often, this results in senseless registration delays and restrictions which threaten the ability of farmers to protect their crops.

While CFBBF supports the need for regulatory oversight, we are concerned that the EPA is shifting its focus from science-based risk assessment to a more troubling precautionary approach. Regulatory oversight can only be effective if it is based on sound scientific principles. Recent actions taken by the EPA have diverged from these principles and threaten the future success of modern agriculture. The following are indisputable examples of this dangerous trend:

- Following new guidance regarding pollinator warnings on labels, the EPA proposed changing the basis of its long-standing policy of scientific risk assessment in favor of a "hazard-based" approach. This completely ignores the importance of exposure when determining risk, breaking a fundamental tenet of toxicology.
- As part of its proposed rule regarding pollinators, the EPA issued letters to registrants requesting them to withdraw all pending applications for new label uses. The EPA is demanding that applications be resubmitted only after developing additional, costly and time-consuming data not originally required – but failed to provide sufficient justification to this change in policy.
- The EPA conducted a benefits analysis of insecticide-treated seeds on soybeans without consulting farmers or other agricultural experts, including USDA economists, resulting in the publication of a misleading report that significantly undervalued the benefits these products possess.
- After completing a 5-year review of an insecticide's potential impact on honey bee health, the EPA misled the public by issuing a press release that basically ignored the low risk potential found in their review. Instead of taking the opportunity to reassure the public, the EPA needlessly took an alarmist approach that further diminished our ability to educate using science.

- The EPA recently moved to cancel the registration of a new insecticide, important to grower integrated pest management (IPM) programs, without undergoing a full review process. The revocation is based on theoretical modeling which claims certain organisms living at the bottom of agricultural ponds are at risk, despite six years of real-world monitoring showing no evidence of harm.
- In a move that defies belief, the EPA asked the 9<sup>th</sup> Circuit Court to revoke an existing herbicide label the agency had previously approved – essentially suing itself to nullify procedural protections to the registrant that are guaranteed by federal law.

The common thread in these examples is an agency that appears increasingly focused on trivial risks and less interested in the important benefits these technologies bring to society. Whether this is due to external pressures from activist groups that are vehemently opposed to modern agriculture, or a lack of understanding about what it takes to grow a crop, the trend is disturbing and dangerous.

The global economy demands that we be best-in-class in managing our production. Investment costs in the seed and chemical technologies we use today are expensive, but they have helped us optimize our operational capacity to stay one step ahead of our global competitors. Moreover, these technologies enable us to avoid costs associated with older practices that no longer meet the high standards required by today's best management practices.

Farmers and ranchers depend upon the new technologies that come from investment in innovation. Yes, we want the EPA to ensure these technologies are safe for humans and the environment, but we also want the agency to be responsive to the legitimate concerns of agriculture when developing regulatory policy. Modern agriculture has been good for farmers and ranchers, the general public, the environment, and our nation's economy. Because innovation is the life-blood of not just our industry but the nation as a whole, we believe the EPA should support safe new technologies instead of finding undue reasons to deny them.

Thank you again for the opportunity to provide input on the farm economy.

Sincerely,



Paul Wenger  
President