

MCFA

Minor Crop Farmer Alliance

Sent via email to reorganization@usda.gov.

August 26, 2025

Honorable Brooke Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Re: Comments on the US Department of Agriculture Re-organization Plan as Outlined in the Secretary's Memorandum of July 24, 2025

Dear Secretary Rollins:

This is in response to your request for comments on the US Department of Agriculture Re-organization Plan as Outlined in the Secretary's Memorandum of July 24, 2025. On behalf of members of the Minor Crop Farmer Alliance (MCFA), this is to express our strong interest in assuring that the Reorganization Plan does not adversely impact a relatively small, but exceptionally critical program upon which the agriculture community heavily depends. Specifically, we want to assure the continuation of a robust Pesticide Data Program (PDP) administered by the Agricultural Marketing Service (AMS). Since 1991, the PDP activities directly benefit growers, providing critical support to the agricultural community because they include the sampling, testing, and reporting of pesticide residues on agricultural commodities from both domestic and imported sources in the U.S. food supply, with an emphasis on those commodities highly consumed by infants and children. It is used in assisting with the addition of new crop protection products as well as the potential expansion of existing products, benefiting the agricultural community. It is implemented through cooperation with State agriculture departments and other Federal agencies.

The data developed by the national PDP:

- Helps provide regulatory certainty for growers and packinghouses by enabling the U.S. Environmental Protection Agency to reliably assess actual dietary exposure to pesticide residues.
- Empowers the Foreign Agricultural Service and others in supporting and facilitating the global marketing of U.S. agricultural products.
- Provides guidance for the U.S. Food and Drug Administration and other governmental agencies to make informed decisions.
- Helps monitor and confirm the safety of the U.S. food supply.

MCFA is an alliance of national and regional organizations and individuals representing growers, shippers, packers, handlers and processors of various agricultural commodities, including food, fiber, turfgrass, nursery and landscape crops, and organizations involved with public health pesticides. MCFA's members are extremely interested in the development and safe use of pest management tools including crop protection chemicals that are environmentally sound, safe for applicators, workers and the public, and do not represent an unreasonable adverse risk to the environment, including humans and non-target organisms such as pollinators. While our commodities are often called "minor crops" or "specialty crops," they contribute to the diverse and highly nutritious diets available for the global population, and to safe and aesthetic surroundings for our homes, schools, and places of business. These U.S. farmers and producers grow more than 500 types of fruit, vegetable, tree nut, flower, ornamental nursery and turfgrass crops in addition to the major bulk (row) commodity crops. Specialty crop production accounts for more than \$60 billion, or approximately 40% of total U.S. crop receipts.

Other federal governmental agencies, state regulatory authorities, land-grant University personnel, dietitians, non-profit organizations, and the boots-in-the-field producers themselves from across the nation are just a few examples of those who have extended histories of persistently citing and benefiting from the information generated by the PDP. The Program delivers credible science-based, statistically reliable information for all consumers about the safety of fruits and vegetables. It has long been recognized as the type of successful, cost-effective program that the government should strive to emulate. It is critical that the PDP has the necessary resources, including knowledgeable personnel and funding, to assure that this important data collection effort continues. The data it generates directly impacts the ability of our members to produce and distribute their agricultural commodities. Additionally, specialty crop industries have learned from experience that pesticide residue data are essential in defending against misinformed or irresponsible claims that pesticide residues on specific foods are unsafe. American consumers also benefit by having access to the reliable residue information that the PDP develops. Those data help reaffirm that the government's regulations involving pesticide residues and other food safety efforts are working well in protecting public health.

Everyone agrees that eating more fruits and vegetables is one of the best things we can do to reduce disease, prevent obesity, and improve our overall health. Through its function and efforts, the PDP consistently helps validate the safety of these fruit and vegetable products for dietary consumption. Because of the critical service and data the PDP provides, we urge you to take the steps necessary to assure that the Reorganization Plan does not adversely impact its operation, including the AMS personnel that are so necessary for its continued successful operation. From our perspective, the continued location in the Washington metro area of the core program leadership, Monitoring Programs Division staff and management group, facilitates both the growers' ability as well as the ability for other federal agencies that become involved in pesticide residue issues to interact with program personnel. It is vital that the PDP continues to have the requisite number of skilled personnel and adequate funding to effectively produce reliable pesticide residue data without undue disruption.

Thank you for the opportunity to submit these comments. We are confident that after reviewing these comments you also will agree with them. If you need any additional information, please let me know at mike.aerts@ffva.com.

Sincerely,

A handwritten signature in black ink, appearing to read "M J Aerts".

Michael J. Aerts
Chairman; MCFA Technical Committee

California Citrus Quality Council
California Fresh Fruit Association
California Garlic and Onion Research Committee
California Prune Board
California Specialty Crops Council
Florida Citrus Mutual
Florida Fruit and Vegetable Association
Florida Tomato Exchange
International Fresh Produce Association
National Potato Council
Northwest Horticultural Council
Texas Citrus Mutual
US Apple Association
USA Pulses
Washington Winegrowers Association
Wild Blueberry Commission of Maine