

**USA Dry Pea & Lentil Council**  
**Policy Positions 2024**  
**Farm Policy**

*The USA Dry Pea & Lentil Council (USADPLC) seeks to be included and treated equally with other farm program commodities in farm and conservation program support.*

- 1. Federal Crop Insurance Reform.** The USADPLC supports equitable Federal Crop Insurance programs for dry peas, lentils, and chickpeas at an affordable price. The USADPLC supports the following improvements to federal crop insurance for pulse crops:
  - a. Level of Support.** Maintain at least the present level of support for Crop Insurance in the FY 2025 Budget.
  - b. “Dry Pea” Loss Data.** Continue to support USDA-Risk Management Agency (RMA) in establishing dry pea loss adjustment standards data for autumn- and spring-sown peas, lentils, and chickpeas using studies and actual evaluations of pulses to accurately represent losses.
  - c. Non-Futures Pulse Crop Revenue Insurance Program.** USADPLC supports the full implementation of the pulse crop revenue insurance utilized in the “pulse crop non-futures revenue pilot program” for dry peas, lentils, and chickpeas.
  - d. RMA Projected Price.** USADPLC requests RMA push the projected price deadline for collecting data closer to the RMA announcement date of March 1 to better reflect projected prices for all pulse crops.
  - e. Harvest Price Data.** USADPLC supports removing spring contract payments from consideration of harvest price data collection. Spring contracts reflect cash prices from a different period than harvest so the payments made during the harvest price collection period should not be included in harvest price establishment.
  - f. Rename “Dry Pea” Policy.** USADPLC supports renaming the “Dry Pea” Policy as the **Pulse Crop Policy** to more accurately reflect all the crop types covered.
- 2. Farm Program & Crop Insurance Incentives for Climate-Smart Commodities.** The best way to achieve the adoption of agricultural climate targets is through **voluntary** programming that provides an incentive to maintain or adopt new farming practices that reduce greenhouse gas (GHG) emissions. This can be achieved through the following:
  - a. Direct Payments.** Direct Farm Program Payments to incentivize climate-smart crops and cropping systems.
  - b. Crop Insurance Subsidies.** Increased crop insurance subsidies for climate-smart crops and cropping systems.
  - c. Conservation Program Incentives.** Conservation program incentives for climate-smart crops and cropping systems that promote soil health. The USDA-Natural Resources Conservation Service (NRCS) should expand its programming to assist farmers and ranchers in lowering GHG emissions through the support of crops that have a low carbon footprint, are nutrient-dense, and require less water to produce.
- 3. Farm Bill 2024 Implementation.** USADPLC is working for full equality for pulse crops as commodities under Federal Farm Policy. The USADPLC supports:
  - a. Farm Bill 2024 Safety Net:** USADPLC supports farm bill programs that include pulse crops, ensuring equality with other program crops in the next Farm Bill.

- b. Pulse Crop Health Initiative (PCHI).** USADPLC supports full funding of the PCHI. Funding of the PCHI at the authorized level will ensure that it accomplishes its overall purpose to find solutions to the critical health and sustainability challenges facing the US through research on pulse crops. The PCHI focuses on three primary goals: 1) improving human and animal nutrition, 2) improving knowledge of functionality, and 3) improving the sustainability and productivity of cropping systems using pulses. USADPLC continues to play a key advisory role in working with the USDA-Agricultural Research Service (ARS), National Institute of Food and Agriculture (NIFA), and USDA-Research, Education, and Economics (REE) to establish strategic goals, recommended proposals, and initiative performance measures. *USADPLC supports authorizing the PCHI in the 2024 Farm Bill at \$25.0 million per year for five years.*
  - c. School Pulse Crop Products Program.** USADPLC supports appropriated funding of the School Pulse Crop Products Program (PCPP). With the announcement of the 2020 Dietary Guidelines for Americans, permanent funding of the PCPP will help ensure increased introduction of pulses (dry peas, lentils, chickpeas, and dry beans, both whole and as ingredients) in school nutrition programs, evaluation of the acceptability of pulses, identification of suitable products for school lunches, evaluation of the adoption of pulses outside of school, and evaluation of the effects of pulse products on nutrition. *USADPLC supports an increase in the authorization for the PCPP to \$4.0 million per year for five years in the 2024 Farm Bill.*
  - d. Add “Fava Beans” Exception to Base Acres.** The USADPLC requests that *Sec. 1114. Payment Acres, paragraph (e) Effect of Planting Fruits and Vegetables* be amended to include Fava (also called Faba) Beans as an exception to base acre reductions required by the planting of Fruits and Vegetables. This would be incorporated into the next Farm Bill.
  - e. Base Acre Recalculations.** The USADPLC supports voluntary base acre updates that reflect current planted acres to allow for increases in base acres due to the addition of pulse crops and the conversion from summer fallow-wheat rotations to continuous cropping with pulses and other crops in rotation with wheat and grains.
  - f. Pulse Crop Climate Initiative.** USADPLC supports creating a research fund focused on providing solutions to improving human health and mitigating climate change in our food system. We propose a minimum of \$1.0 billion in new research funding through the USDA-ARS and NIFA to advance the productive capacity, nitrogen-fixing ability, crop management, nutrient density, and food processing flexibility of pulse crops. The pulse research funding would focus on breeding and genetics; nitrogen fixation; soil health; crop management systems; human health and nutrition; animal health and nutrition; new product development; crop quality and functionality; food processing; and crop management for conventional and organic production including diseases, insects, weeds, crop rotation, cover crops and intercropping. *USADPLC supports establishing a Pulse Crop Climate Initiative authorized at \$1.0 billion in the 2024 Farm Bill.*
  - g. Reduction in Paperwork.** USADPLC supports utilizing current business systems like email, texting, and electronic communications to improve notifications and sign-up procedures. The USADPLC encourages sharing data among USDA agencies, so the customer is only asked for the same information at the first point of service, i.e., crop records established at FSA are shared with crop insurance agents.
- 4. Childhood Nutrition Act Reauthorization.** Pulses are nutrient-dense foods that are high in protein and fiber with little or no fat. Increasing pulses in school meals is an economical way to add plant proteins and fiber into children’s diets without increasing saturated fat or cholesterol. In 2015 and 2016, Congress considered reauthorizing the Healthy, Hunger-Free Kids Act of 2010 which expired on September 30, 2015. The current legislation identifies “beans and peas (legumes)” as unique foods that can be counted as either a meat alternative or a vegetable. However, this legislation limits the acceptable form to “whole cooked beans, dry peas, and lentils (except hummus)”. The legislation includes pulses in the vegetable subgroup “beans

and peas (legumes)” with a requirement of only 1/2 cup per week for all ages. Increasing flexibility to meet this requirement will enhance the nutritional quality of school and government meal programs. ***USADPLC requests legislation supporting the increased use of pulse crops in school meal programs as follows:***

- a. Continue requirements for minimum weekly servings of vegetables from subcategories including “beans, peas, and lentils (legumes)” in the school meal program.
- b. Include the term pulses, collectively known as beans, dry peas, lentils, and chickpeas into the “beans and peas (legumes)” category definition.
- c. Allow both whole or pureed pulses and ingredients derived from an eligible pulse crop to be credited in federally reimbursable meals. These food products include pulse flours and pulse-based products such as chips and pasta.

**5. Food and Nutrition Programs.** Pulse product manufacturers are discouraged by the barriers their products face in receiving credit in the school meals programs. USDA should continue the flexibility announced through a 2019 Policy Memo that allows credit for pasta made of pulse flour to count as a vegetable, even if the pasta is not served with another recognizable vegetable. USDA should extend this flexibility to allow pasta made of pulse flour to count as a meat alternate, even if the pasta is not served with another recognizable meat alternate. Requiring additional vegetables and meat alternates on top of serving pulse pasta creates logistical and cost barriers for schools that often force them to overlook pulse products for an easier alternative. Texturized vegetable protein is nearly impossible to credit in the school meals program due to the Protein Digestibility Corrected Amino Acid Score (PDCAAS) requirements for alternate protein products. Manufacturers of pulse crop burgers and other proteins are frustrated because, despite the protein and nutrient content of their products, they are not able to reach an 80% PDCAAS value. ***USADPLC encourages USDA to consider additional flexibility and crediting innovative products like pulse pasta, flour, breadings, and beverages in Food and Nutrition Programs.***

**6. Trade Sanction Policy.** The USADPLC opposes any trade sanctions on food, except in cases of extreme national emergency or a declaration of war.

**7. Requested Reforms to Food Safety Modernization Act (FSMA) Rules.** Although the FDA has directed its inspectors to exercise “Enforcement Discretion” until the regulations are changed, the USADPLC continues to push for final enactment of the following revisions of the FSMA:

- a. **Exempt pulses from Produce Safety Regulations.** Exempt through notice-and-comment rulemaking dry field peas from 21 CFR 112 by placing it on the list of produce such as potatoes, sugar beets, and other vegetables that require further processing to create edibility and are therefore exempted from the Produce Safety regulation.
- b. **Reclassify pulses as food grains.** Reclassify pulses through notice-and-comment rulemaking as “food grains”, NOT as “vegetables” or “produce”.
- c. **Make pulses exempt from Preventive Controls.** After reclassifying pulses as food grains, confirm that they would become eligible for the exemptions called out in 21 CFR 117.5 (j) Preventive Controls, Holding, and Transport of a raw agricultural commodity (RAC) (other than fruit and vegetable) intended for further distribution or processing; and 21 CFR 507.5 (g).
- d. **Pulses are harvested dry—not dried in processing.** Drop the designation of pulses as “dried/dehydrated RACs [that] are processed foods” (p.12 “Policy Regarding”) in relationship to farm designation. Include an operation that solely packs, packages, or holds pulses under the farm definition of “secondary activities farm”. See 63FR54532 where the Environmental Protection Agency (EPA) and Food & Drug Administration (FDA) conclude that drying a RAC causes it to become a processed food unless that drying is to facilitate storage or transportation of that commodity.

**USA Dry Pea & Lentil Council  
Policy Positions 2024  
Research**

*Research is the backbone of successful farm commodity production. USADPLC supports the efforts of Congress and the Administration to help farmers and America's economy by increasing investment in agricultural research. The public is asking for help understanding the health benefits of their food and discovering the sustainability of their food system. USADPLC is working to increase pulse crop research dollars for health information, functionality, and sustainability.*

**1. Pulse Crop Health Initiative (PCHI) in 2024 Farm Bill (\$25.0 million per year, five years).** The purpose of the PCHI is to find solutions, through research on pulse crops, to the critical health and sustainability challenges facing the US and the world. The PCHI will focus on four major goals: 1) reducing obesity and related chronic diseases; 2) increasing food security; 3) improving sustainability; and 4) improving human and animal health. The USADPLC supports permanent funding of the PCHI at \$25.0 million per year for five years. This will require the establishment of policies and procedures to establish goals, provide guidance, and prioritize the research funded through the PCHI. The USADPLC will participate in the establishment and administration of this initiative to help prioritize research efforts and meet the needs of our nation. ***The USADPLC requests \$25.0 million per year for five years for the Pulse Crop Health Initiative in the 2024 Farm Bill to find solutions, through pulse crop research, to the health, nutrition, and sustainability issues facing our country.***

**2. Research Plant-Based Foods as Sources of Nutrients of Concern (\$25.0 million per year, five years).** The designation of “nutrients of concern” (dietary fiber, vitamin D, calcium, potassium), established by the USDA, provides an important tool to focus agriculture and food research. USADPLC requests that the USDA devote a portion of the Agriculture and Food Research Institute (AFRI) competitive grants toward using plant-based foods as sources of nutrients of concern. Research should add investigations into the nutrition provided by plant-based foods and the development of processing, functionality, and bioavailability of nutrients in plant-based foods and food products. Pulses, i.e., dry peas, lentils, chickpeas, and dry beans are plant-based foods that provide major sources of nutrients of concern. ***USADPLC requests \$25.0 million per year for five years in FY 2024-29 for research on plant-based foods as sources of nutrients of concern.***

**3. Climate-Smart Agriculture Research Funding (\$1.0 billion).** USADPLC proposes \$1.0 billion focused on pulse crops to accomplish the following:

- Increase nitrogen fixation of pulse crops.
- Improve productivity of climate-friendly crops like pulses.
- Increase functionality and processing technology to include pulses in more products.
- Increase nutrient density and nutrient availability for healthy, climate-friendly diets.
- Focus research efforts toward achieving net-zero carbon emissions from agriculture.

***USADPLC supports establishing a Climate-Smart Agriculture Research Program of \$1.0 billion focused on finding climate change solutions for agriculture.***

**4. Increase Base Level Funding for USDA-ARS (\$10.13 million).** The pulse industry has expanded significantly over the past two decades, growing from nearly 1.5 million acres in 2000 to over 3.2 million acres of dry peas, lentils, chickpeas, and dry beans in 2023. During this time, base level funding of USDA-ARS research programs focused on pulse crops has at best remained stagnant or at worst been reduced. ***The USADPLC requests an increase to base level funding of \$10.13 million to support the following research programs:***

**Request for USDA-ARS Base Level Increase Focused on Pulse Crops**

	Current Base	Requested Increase	Projected Funding
<b>Base Level Increase-ARS Fargo, ND</b>			
Add Pulse Crop Quality Research Center to Wheat Quality Lab	\$ 2,500,000	\$ 3,500,000	\$ 6,000,000
<b>Total for ARS-Fargo, ND</b>	<b>\$ 2,500,000</b>	<b>\$ 3,500,000</b>	<b>\$ 6,000,000</b>
<b>Base Level Increase-ARS Pullman, WA</b>			
Grain Legume Genetics Physiology Research Unit			
Pullman Pathology, Pulse Breeding			
Prosser Pathology, Weeds, Pulse Breeding	\$ 2,440,097	\$ 4,500,000	\$ 6,940,097
Increase for Winter Pulse Breeder	\$ 120,000	\$ 630,000	\$ 750,000
Plant Germplasm Introduction & Testing (Grasses, Pulses, Alfalfa)	\$ 2,794,588	\$ 1,000,000	\$ 3,794,588
<b>Total for ARS-Pullman, WA</b>	<b>\$ 5,354,685</b>	<b>\$ 6,130,000</b>	<b>\$ 11,484,685</b>
<b>Base Level Increase-ARS East Lansing, MI</b>			
ARS Pulse Breeding Program-Michigan	\$ 624,000	0	\$ 624,000
<b>Total for ARS-East Lansing, MI</b>	<b>\$ 624,000</b>	<b>\$ 0</b>	<b>\$ 624,000</b>
<b>Base level increase to Sclerotinia Initiative</b>			
National Sclerotinia Initiative Increase	\$ 2,500,000	\$ -	\$ 2,500,000
<b>Total Request for USDA-ARS Base Level Funding Increase for National Pulse Research</b>	<b>\$ 10,978,685</b>	<b>\$ 9,630,000</b>	<b>\$ 20,608,685</b>

**5 USDA-ARS Pulse Crop Quality Network (\$4.0 million).** The USADPLC supports an immediate \$4.0 million increase to make a total of \$6.0 million in funding for a USDA-ARS program to develop new uses for pulse crops through the evaluation of end-use characteristics such as cooking time, canning quality, frying traits, milling characteristics, extrusion consistency, protein, starch, and other nutrient factors important to end-users. Nutritional and functional characteristics would be linked to genetic information to improve the breeding efforts and overall quality of the crop. The creation of the North Dakota State University and USDA-ARS Pulse Crop Quality Network at Fargo, ND; Pullman, WA; and East Lansing, MI, along with the allocation of funding to the USDA-ARS Pulse Breeding program at WSU, will complement the efforts of state and USDA-ARS scientists focused on pulse quality across the country. With additional base level funding, the ability to determine the overall quality of pulse crops, the relationship between genetics and quality traits such as cooking time and taste, and the ability to establish new uses for pulses will be expanded. *The USADPLC requests a \$4.0 million increase in appropriation in FY 2025 to fund a new network of USDA-ARS scientists dedicated to developing new food and industry end uses for dry peas, lentils, and chickpeas at USDA-ARS lab facilities.*

**6 USDA-ARS Winter Pulse Crop Plant Geneticist Position (\$630,000).** Dry pea, lentil, and chickpea growers need fall-seeded cool-season pulses in their crop rotations to advance their climate-smart agriculture goals. The development of high-yielding fall-seeded pulse varieties will help US growers remain competitive with rapidly expanding pulse acreage in Canada and Australia. Research trials conducted from 2021 to the present show that fall-seeded winter pulses have the potential to provide increased productivity during a drought. The proposed position would be established at the USDA-ARS Grain Legume Genetics Physiology

Research (GLGPR) Unit at Washington State University, Pullman, WA. In FY 2006, Congress appropriated \$120,000 for this position. Since FY 2006, the partial funding of this critical position continued and is part of the USDA-ARS budget. ***The USADPLC requests a \$630,000 appropriation in FY 2025 to fully fund a new USDA-ARS Winter Pulse Crop Plant Geneticist located in Pullman, WA.***

**7 Sclerotinia Initiative (\$2.5 million).** Since 2004, the pulse industry has joined with soybeans, dry beans, canola, sunflowers, and the USDA-ARS to manage the Sclerotinia Initiative, currently funded at \$2.5 million, to combat Sclerotinia or “white mold”. This project receives industry input, selects competitive, scientifically sound research projects, and uses an outside review process to audit the progress of research toward goals. Reported outcomes include finding sources of Sclerotinia resistance, improving basic knowledge about the pathogen, and exploring the efficacy of management tools. Since the formation of the initiative, additional genetic resources have become available such as the genetic maps of soybean, *Medicago truncatula*, and the Sclerotinia pathogen. Last year, the funding level was increased and the initiative can now provide producers with important crop management tools to make progress against this disease. Recent discoveries include potential biocontrol products and innovative genetic tools. ***USADPLC requests that the \$2.5 million funding for the Sclerotinia Initiative remain unchanged for FY 2025. This funding would be included in the USDA-ARS base level budget.***

**8 Grain Legume Genetics Physiology Research (GLGPR) Unit (\$4.5 million).** The USDA-ARS considers a scientific position fully sustainable at \$750,000. The GLGPR Unit includes three scientists focused on pulse crop breeding, two plant pathologists, and a soil microbiologist. Current funding for these six positions is \$2.4 million which amounts to only \$400,000 per scientist. This group of scientists provides the USDA-ARS with key pulse crop genetics research and scientific leadership. With pulse crop acreage expanding and the potential uses of pulse crops also expanding, it is critical that USDA-ARS base level funding is increased to provide sustainable scientific research on pulse crops. ***The USADPLC requests increased funding of \$4.5 million for six scientific positions in the USDA-ARS Grain Legume Genetics Physiology Research Unit at Pullman, WA and Prosser, WA.***

**9 Plant Germplasm Introduction & Testing Research (\$1.0 million).** The USDA-ARS Plant Introduction unit at Pullman, WA houses the genetic resources (germplasm) for pulse crops in the US. The unit contains seeds for dry peas, lentils, chickpeas, lupin, fava beans, and dry beans and is the primary source of genetic diversity of pulses in the US. This collection is a critical resource for plant breeders to develop disease resistance, improve nutritional traits such as protein content, and improve the quality of pulse crops. Current funding supports three full-time scientists, the support programming for these scientists, and support for the physical storage facility. The unit requires additional funding to properly maintain the germplasm, catalog traits and genetic information on different genetic databases, fund additional collection missions, increase storage capacity, and increase the ability to answer requests for germplasm. ***USADPLC requests an additional \$1.0 million to increase support for this critical facility.***

**10 Alternatives to Fumigation as Protection against Bruchids and Nematodes.** The US pulse industry has faced market uncertainty with India each year due to a requirement to fumigate shipments of US pulse crops with methyl bromide (MeBr) before arrival at Indian ports to prevent bruchids and nematodes from entering the country. India is the largest market for US dry peas and lentils and in the top five markets for US chickpeas. Exporters are faced with US regulatory pressure to reduce MeBr use, technical problems due to labeled usage in the US, and no effective alternatives to control the pests. ***USADPLC requests USDA-ARS focus the MeBr alternatives initiative on finding effective alternatives for the fumigation of stored grains.***

**11 Pulses and Dilated Cardiomyopathy (DCM) in Canines.** The Food & Drug Administration recently linked DCM in dogs to pulses in their diets. This created a significant negative impact on pulse markets. ***The USADPLC strongly supports scientific research investigating the nutrition provided to companion animals in diets including higher concentrations of pulses. In addition, the USADPLC requests that all announcements about pet food nutrition be based on sound science and clearly communicate the actions consumers need to keep their pets safe.***

**USA Dry Pea & Lentil Council**  
**Policy Positions 2024**  
**Market Promotion**

*The US dry pea, lentil, and chickpea industry consists primarily of small, family-owned businesses that provide value-added jobs in rural and export communities. Over 60% of these pulse crops are exported overseas. To keep our rural economies strong, the Federal Government must join our industry to aggressively promote our products. Increased funding authorized by Congress and the Administration is needed for market promotion of US farm commodities. Last year the dry pea, lentil, and chickpea industry contributed over \$475,000 to the Market Access Program (MAP) and Foreign Market Development (FMD) market promotion activities.*

**1. Market Access Program (MAP; \$400 million).** Strong market promotion programs are critical to increasing the demand for pulses around the world. The MAP has been a highly effective program for the US dry pea, lentil, and chickpea industry, resulting in increased sales to India, Latin America, Asia, and Europe. Effective market promotion programs are critical to the long-term financial health of US farmers and the USADPLC fully supports continuation of the MAP. ***The USADPLC requests funding of \$400 million for the Market Access Program in FY 2025 appropriations.***

**2. Foreign Market Development (FMD) Program (\$69.0 million).** The USADPLC has been a USDA-Foreign Agricultural Service (FAS) Cooperator since the late 1960s. This market development program is jointly funded by the pulse industry and the Federal Government to provide technical and trade service assistance to our overseas customers. FMD funds have been used effectively to develop new markets for dry peas, lentils, and chickpeas in Asia Pacific, Europe, the Indian sub-continent, and Latin America. ***The USADPLC requests funding of \$69.0 million in FY 2025 appropriations for the Foreign Market Development program.***

**3. Food Aid Funding (\$1.9 billion).** PL 480 is a food aid program designed to assist those in need around the world. The American people have a long history of sharing their wealth with those facing natural disasters and economic hardship. The program builds goodwill and strengthens the relationship between the US and developing countries. Dry peas, lentils, and chickpeas provide an inexpensive source of protein, vitamins, and minerals to those PL 480 recipients facing food shortages. The USADPLC strongly supports the PL 480 program for humanitarian purposes and as a tool for developing future markets for US commodities. Current high-volume customers like India, Pakistan, Colombia, and the Philippines were once important PL 480 customers. ***The USADPLC requests funding of \$1.9 billion in FY 2025 appropriations to fund PL 480 Title II and McGovern-Dole food aid programs.***

**4. Free Trade Agreements.** The USADPLC supports free and fair trade between countries. Over 60% of the peas and lentils produced in the US are exported overseas. Reducing trade barriers is vital to the continuing growth of our industry. ***USADPLC supports the enforcement of current free trade agreements.***

**5. Trade Barriers.** The USADPLC will continue to work toward its goal of reducing and/or eliminating unfair trade barriers. The top priority for the industry is the elimination of phytosanitary issues for trade with India, China, Canada, and Brazil. A second priority is the normalization of trade with Cuba, including the creation of financial mechanisms to facilitate payments to US suppliers.

**6. Export-Import (EXIM) Bank Funding.** The service provided by the EXIM bank helps the industry to trade with many less developed countries and opens important markets for pulse products. ***USADPLC supports full funding of the EXIM Bank.***

**7. Climate-Smart Agriculture Marketing Promotion Program (\$1.0 billion).** We propose the creation of a new domestic marketing and promotion program patterned after the USDA-FAS Market Access Program. Grants would be provided to US farmers and their commodity organizations to educate consumers on the benefits of eating climate-friendly foods that are nutritious and good for the planet. We propose a minimum of \$1.0 billion for this program with the distribution of funds directed to commodities that will help US agriculture achieve a 30% reduction in GHG by 2030. This program should allow organizations to pay for administrative overhead to execute their programming in compliance with federal law and guidelines. The US pulse industry suggests allocating these funds as follows:

- a) **USDA Climate-Friendly Food Label.** To assist in the marketing and promotion of climate-smart food products, USDA should establish a labeling program for products that meet established scientific criteria for reducing GHG emissions, lowering water use, reducing food waste, and providing balanced, affordable nutrition for human health.
  - i. **Market Promotion-** Provide funding for organizations representing climate-smart commodities to educate consumers on the benefits of climate-smart foods.
  - ii. **Food Service Industry & Influencers-** Allow organizations who represent climate-smart crops to educate and work with foodservice operators, chefs, and social media influencers on developing climate-smart food choices that taste great and lower GHG emissions.
  - iii. **School Food Programs-** Allow commodity organizations to work directly with school feeding programs to test climate-smart foods prepared and served in ways that appeal to kids. Provide school districts additional credit to purchase climate-smart foods.
- b) **Climate-Smart Agriculture Processing Program.** USADPLC proposes the creation of a Climate-Smart Agriculture Processing Program (or tailoring existing USDA programs to increase utilization) to provide grants to processors and food manufacturers to upgrade food processing facilities and lower their GHG emissions. Just as NRCS provides technical assistance to farmers to improve conservation practices and outcomes, such assistance should help processors and food manufacturers identify and implement upgrades and systems changes that lower GHG emissions at their facilities. These programs should also support the establishment of processing facilities where they do not currently exist. As the acreage of pulse crops expands across the country, an increased number of storage, delivery, and processing facilities will be required.
- c) **Climate-Smart Food Innovation Program.** USADPLC proposes programs to support food innovators in developing climate-friendly food choices. For example, the pulse industry works with the pork industry on a campaign called “Powerful Pairings”. USDA could facilitate and support such partnerships to develop new products that consider consumer preferences while also reducing the carbon footprint of food products.



**USA Dry Pea & Lentil Council**  
**Policy Positions 2024**  
**Crop Protection Regulations**

*If US dry pea, lentil, and chickpea growers are to compete effectively in domestic and global markets, crop protection materials must evolve just as the pests they help control are evolving. In addition, US producers must not lose markets due to labeled use of available crop protection materials which are the most effective, least costly, or pose the lowest environmental risk.*

- 1. Crop Protection Labels.** The USADPLC will work to secure labels for the following active ingredients. It is critical that these crop protection materials be approved by EPA as soon as possible:
  - a. Section 3 label registration for **Storm®** (*Bentazon* and *Acifluorfen*) post-emergence herbicide on chickpeas and peas.
  - b. Section 3 Federal Label for **Omega®** (*Fluazinam*) fungicide on lentils (dry peas) through the IR-4 Program.
  - c. Section 3 Federal Label for **Beleaf®** (*Flonicamid*) on dry peas, lentils, and chickpeas to control sucking insects like aphids and lygus bugs.
  - d. Federal Label for **Transform®** (*Sulfoxaflor*) insecticide on dry peas and lentils through the IR-4 Program.
  - e. Section 3 Federal Label for **Diquat®** (*Diquat dibromide*) as a pre-harvest aid for pulse crops.
  - f. Continued support for the Section 3 Federal Label for *Dimethoate* to control aphids in peas and lentils.
  
- 2. Crop Protection Harmonization.** Providing access to improved crop protection tools is a major goal of the USADPLC, but without wide acceptance of Maximum Residue Limits (MRLs), new products risk becoming an artificial barrier to trade. USADPLC is working on the following efforts to harmonize MRLs and improve access to new crop protection materials:
  - a. **Codex Reform.** USADPLC is working with Global Pulse Confederation partners to encourage efficiencies at the Codex Committee on Pesticide Residues (CCPR) which provides better access to trade through the harmonization of international MRLs. *USADPLC supports efforts to create efficiencies at the Codex Committee on Pesticide Residues.*
  - b. **Harmonization of MRLs.** To prevent serious disruptions in trade, MRLs should be harmonized between our trading partners. Many of our partners use the CODEX standard as their default MRL. Currently, the CODEX standards lack MRLs for many widely used crop protection products. *USADPLC supports the efforts of our agency partners, including the EPA, IR-4 Project, USDA-FAS, and others, to add MRLs for pulse crops to all our trading partners, particularly the CODEX.*
  - c. **Use of Crop Groups.** Crop Groups in the US are created to achieve maximum use of residue testing. Multiple crops within one group are registered with the MRL established for a single “representative” crop. For example, with this system, the MRL established with trials for dry peas can be applied to lentils and chickpeas. *USADPLC endorses efforts by the IR-4 Project and the EPA to gain acceptance for this system in the CODEX standards and with our trading partners.*
  - d. **Establish International Crop Zones.** Crop Zones are another method of making residue testing more efficient. The creation of international crop zones encourages international cooperation and joint pesticide registrations by combining work done in several geographic regions rather than just one country. *The USADPLC supports sharing both data and regulatory capacity using expanded international crop zones and crop use patterns to evaluate pesticide residue data. The USADPLC supports capacity increases to improve the responsiveness for gaining CODEX MRLs.*
  
- 3. IR-4 Project & Pesticide Registration (\$25.0 million).** The IR-4 Project assists in the registration of crop protection products for specialty crops. *The USADPLC supports an appropriation of \$25.0 million in FY 2025 to fund IR-4 Project programs. In addition, the USADPLC supports increased funding of USDA-ARS pest management programs in support of the IR-4 Project.*

**USA Dry Pea & Lentil Council**  
**Policy Positions 2024**  
**Transportation**

*The USADPLC supports the fair, efficient, and cost-effective movement of dry peas, lentils, and chickpeas in the US transportation system. Specifically, the USADPLC endorses:*

**Trucking**

- 1. Exemptions.** USADPLC supports the continuation of agricultural exemptions from hours-of-service (HOS) rules at the state and federal levels with the following incremental changes:
  - a. Eliminate “planting and harvesting periods”.** USADPLC recommends eliminating “planting and harvesting periods” restrictions to provide uniformity for all states and allow flexibility for a diverse range of crops. The USADPLC supports making agricultural exemptions year-round (Jan. 1-Dec. 31).
  - b. Add 150 air miles from the destination to the current exemption.** USADPLC recommends providing HOS exemption within 150 air miles of the source and destination of farm goods. The exemption is provided to allow for the slow speeds required by farm access roads and for underdeveloped roads at the source of the haul. Adding the destination to the exemption would allow drivers to complete the trip rather than “running out of time”.
  - c. Federal Motor Carrier Safety Administration (FMCSA) Pilot Program for Farm Supplier Transport.** USADPLC supports the inclusion of farm supplies in an expanded air-mile radius exemption. The pilot would allow the agency to collect safety data from agribusinesses over a multi-year period to evaluate the impacts of the exemption. The purpose of the program is to help alleviate driver shortages.
  - d. Update FMCSA definition of agricultural commodity.** USADPLC supports finalizing the interim rule updating the definition of an agricultural commodity. The updated definition covers current products and allows for the evolution of agricultural commodities in the future.
- 2. Load Shifting.** USADPLC urges the adoption of a 10% load shift axle tolerance for trucks transporting dry bulk goods. A load-shift tolerance would leave the maximum gross vehicle weight limit unchanged but allow for increased axle weight limits.
- 3. Minimum Financial Responsibility.** USADPLC supports the current minimum financial responsibility of \$750,000 for motor carriers.
- 4. Harmonizing Weight and Length Limits.** USADPLC supports legislation or regulations harmonizing weight limits and lengths on all federal highways at the highest safety level.
- 5. Electronic Logging Devices.** The USADPLC supports the current exemption for agproducers.

**Rail Transportation**

- 1. Surface Transportation Board.** USADPLC supports an open process of selection and confirmation of the full complement of five members of the Surface Transportation Board (STB). USADPLC supports updating the regulations and policies of the STB according to the recommendations of the National Academy of Sciences 2015 Transportation Research Board.
- 2. USADPLC is working to improve the following aspects of rail transportation in the US:**
  - a. Railcar Supply.** Increasing railcar supply and service to all shipment sizes.
  - b. Short Line railroads.** Increase State and Federal funding of short line railroads.
  - c. Northern Tier Double Track.** The USADPLC supports the construction of a double track across the northern tier of the US (Chicago to Seattle) to assist our industry in moving its product to market.
  - d. Equitable Rates for Commodities.** Support equitable rates for similar shipments of pulses and grains.

### *Inland Waterways and River Transportation*

1. **Dredging.** USADPLC supports adequate funding for the maintenance and dredging of water transportation channels.
2. **Update Outdated Locks and Dams.** USADPLC supports funding for upgrades to the transportation infrastructure of locks and dams to accommodate the capacity of modern barge tows.
3. **Dam Preservation.** The USADPLC supports maintaining the current Pacific Northwest (PNW) river transportation system and opposes the removal of PNW dams.

### *Transportation Networks*

1. **Container Hub.** USADPLC supports the establishment of an inland container hub in all pulse-growing states to facilitate expeditious shipping of container freight to ocean-going ports in the US.
2. **West Coast Port Congestion.** USADPLC supports measures to prevent disruptions at port facilities and/or mitigate the impacts of any such disruptions. USADPLC encourages the re-establishment of the Port of Portland container service.
3. **Transportation Infrastructure.** USADPLC supports continued improvement and funding of the Federal Highway Systems including bridges, roads, and port access. USADPLC supports the harmonization of heavy haul routes in all port areas and efforts to reduce port congestion to assist the movement of commodities through populated areas.
4. **Review of Ocean Carrier Container Practices.** USADPLC supports review by the Federal Maritime Commission (FMC) of ocean carriers regarding Demurrage and Detention Guidelines and requirements to provide timely shipping to US exporters by licensed carriers at all US ports.

## **USA Dry Pea & Lentil Council Policy Positions 2024 Farm Labor**

The USADPLC supports hiring US workers as the primary source of labor for our industry at a fair market wage. The USADPLC supports the utilization of the H-2A visa program to provide additional labor from foreign countries in the event of shortages of qualified agriculture workers. USADPLC is opposed to using Bureau of Labor Statistics (BLS) Occupational Employment and Wage Statistics (OEWS) codes for occupations that are non-farm to establish the wage basis for agriculture workers that perform related tasks (i.e. mechanic or heavy equipment operator) as a part of the duties of the ag laborer position. The USADPLC supports increasing flexibility and simplification of the H-2A visa program process, especially for returning seasonal employees.

**USA Dry Pea & Lentil Council**  
**Policy Positions 2024**  
**FGIS, NASS, WOTUS Policy**

- 1. Monitoring Additional Pulse Grading Office.** The USADPLC supports the USDA-Federal Grain Inspection Service (FGIS) certification of North Dakota private grading service and will continue to monitor the establishment of this service for the pulse industry.
- 2. Track Chemical Residues on Pulse Crops.** Maximum Residue Levels (MRLs) are increasingly important criteria for pulse crop export to overseas customers. In recent years, the pulse crop industry has faced MRL violations in the EU and Japan. US wheat and other crops are sampled routinely for chemical residues by FGIS; however, there is currently no impartial scientific sampling of residues on pulse crops. The lack of this data leaves US pulse producers at a disadvantage to competing countries that routinely test their products. *USADPLC requests that FGIS conduct random samples at several ports at least twice per year to determine the MRLs on pulse crops. USADPLC would assist FGIS in determining the panel of chemicals required for testing.*
- 3. Provide Data in Support of Fair Average Quality (FAQ) Determination.** USADPLC determines the FAQ of pulse crops (dry peas, lentils, and chickpeas) each year. A qualified industry committee reviews data provided by FGIS offices and their designated representatives. *The USADPLC requests that FGIS offices and their affiliates be allowed to provide the data required by this process.*
- 4. Establish FGIS Calibration for Protein in all Pulse Crops.** Near-infrared (NIR) testing can easily measure protein in whole seeds. Processors of pulses are beginning to pay a premium price to producers for protein content as pulse crops are utilized as a source of vegetable protein. The industry needs an unbiased standard immediately to help establish protein levels in dry peas, and as soon as possible in all pulse crops. FGIS must establish the calibration standard for measuring protein in pulses. *USADPLC requests that FGIS establish NIR calibration standards for protein in all pulse crops.*
- 5. Funding Stocks on Hand (SOH) Reports in June and December, and Planted Acres Reports in June.** The SOH reports in June and December and Planted Acres reports for lentils and peas were eliminated by sequestration funding cuts. Congress restored funding for these reports in FY 2015. *USADPLC requests that USDA consistently fund these critical reports, SOH in December and June, and Planted Acres for dry peas, lentils, and chickpeas in June of each year.*
- 6. Standardize USDA Statistical Support for Pulses.** Currently, the classes of export products tracked by the USDA-Foreign Agriculture Service (FAS) are different than those tracked by the USDA-National Agricultural Statistics Service (NASS) in production and planting reports. In addition, the prices tracked by the USDA-Economic Research Service (ERS) are different than either the FAS or the NASS. Finally, the commodities and acres reported by the USDA-Farm Service Agency (FSA) are not consistent between states. *USADPLC requests that the USDA standardize tracking information for pulse crops across all services to include: 1) Dry peas, green and yellow; 2) Dry split peas, green and yellow (export data); 3) Lentils, green or regular; small, medium, and large; 4) Lentils, red; all sizes; 5) Chickpeas, Kabuli, small and large; and 6) Chickpeas, desi.*
- 7. Track Products Listed by Harmonized System (HS) Codes.** The pulse industry needs the following HS codes added to the World Customs Organization categorization system:
  - Yellow and Green Peas, Whole/Split
  - Pulse Ingredients
  - Protein (pea, lentil, chickpea, bean)
  - Starch (pea, lentil, chickpea, bean)
  - Fiber (pea, lentil, chickpea, bean)
- 8. Waters of the United States (WOTUS).** The pulse industry supports the current language of the Clean Water Act regarding the Navigable Waters Protection Rule (NWPR); which differentiates state waters from those subject to federal jurisdiction.