

California hires more H-2A guest workers — despite strict new regulatory hurdles for COVID-19

California’s new emergency measures to protect workers from COVID-19 infections in the workplace have added more layers of regulations for agricultural employers dependent on the H-2A visa program for guest workers. The regulations put further pressure on the state’s housing crunch and led to an increase in H-2A violations. Farmworker advocates, meanwhile, say the pandemic has exacerbated longstanding labor issues resulting from the program.

“We learned fast, and we learned hard,” said Jeanne Malitz, an immigration attorney who has advised agricultural employers in California and Arizona for more than 30 years and has worked on H-2A visas since the program began. “Early on in COVID, there were a lot of outbreaks. And we did have some deaths.”

Speaking at a panel discussion for the state’s Agricultural Labor Relations Board (ALRB) last week, Malitz explained that several factors have emerged in recent years that led to a spike in enrollment for the visa program.

California had about 2,500 H-2A workers in 2010, according to the California Employment Development Department (EDD). By 2015 the number had grown to 10,000. **Last year there were about 25,000 H-2A visa holders, working primarily**

with strawberries, lettuce, tomatoes and vineyards in Monterey, Santa Barbara, Imperial, Ventura and San Luis Obispo counties, the top five counties, respectively.



Farm workers harvesting crops.

The program is continuing to see a 9% annual increase in the number of workers and rising demand in Fresno and Sonoma counties. Richard Longo, a deputy regional administrator for the

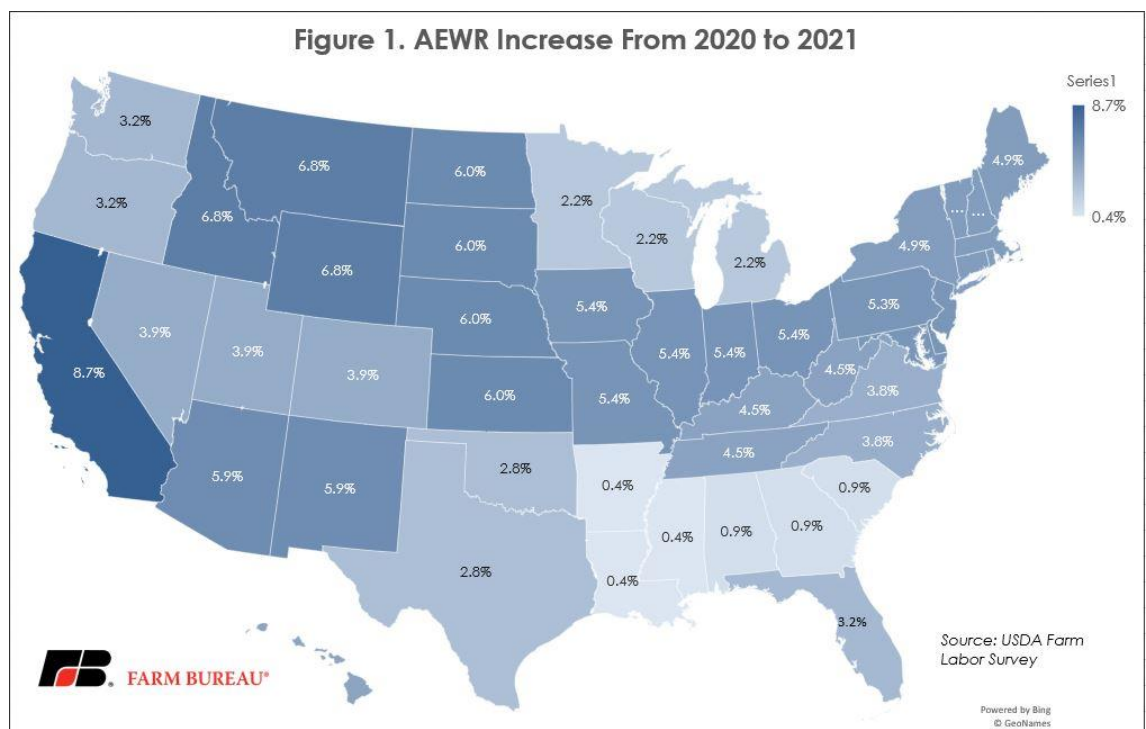
U.S. Department of Labor (DOL), noted that one of the biggest issues is a lot of the workforce in Sonoma comes from the Fresno area, traveling significant distances each day due to the lack of affordable housing in the North Coast region.

Malitz said the state’s growth in the program was spurred by an increase in state I-9 audits in agriculture, forcing employers to terminate their illegal workforce. The E-Verify system for hiring workers became mandatory in some states at the same time. A potential federal mandate that might pass as part of an ag labor bill in Congress could have still more employers turn to H-2A, she said. This coincided with a steady decline in available agricultural workers due to aging out of the workforce or leaving the industry. Longo said that landscaping and construction have been more appealing to farmworkers for the stability of staying in one place and the better pay.

At the same time, increased border enforcement reduced illegal immigration, the traditional source of agricultural labor, said Malitz.

H-2A visa workers come at a higher cost than hiring domestic workers, but employers have increasingly turned to the program because it is legal and reliable.

“If they bring back the same workers every year who are the most productive, they work together and they create teams,” said Malitz, adding that many employers have stayed with the program since the early 2000s, despite California’s increasing wage rate.



What really matters for the H-2A program are the regional annual average gross wage rate for field and livestock workers, which serve as the basis for the AEWR, noted the American Farm Bureau in a [Market Intel post](#). The rate of change from region-to-region varied considerably in 2020. The state of California, which is its own region, had the largest increase – jumping \$1.28/hour, or 8.7%, above 2019. Meanwhile, wages in the Delta region (Arkansas, Louisiana and Mississippi) had the smallest increase - 5 cents/hour, or 0.4%, above 2019. All but three (Delta, Southeast and Lake) of the 18 regions in the FLS exceeded the ECI’s 2.6% increase. Hourly AEWR wages now exceed \$12/hour in all regions except the Delta and Southeast.

Washington and Oregon are the only two states with slightly higher wages than California, which pays \$16.05 per hour. States in the southeast pay far less, with rates as low as \$9 per hour. (For a state-by-state map of actual rates, [click here](#).)

“I’m still surprised, given that Washington, Oregon and California pay so much higher, that we’re not stealing all those workers over here,” said Ruben Lugo, a regional DOL H-2A coordinator.

Paying just 30 cents less, California is beginning to catch up with its northern neighbors. Yet higher wages have not drawn more domestic workers to the state. H-2A is also costly, with employers often spending millions on the program. Malitz has found that those who make the investments are the most successful.

A farm labor contractor joined with growers in building a \$40 million housing facility in Salinas, Calif., for example.

“They didn't even use the H-2A program because the housing was such an incentive for farmworkers that they were able to get domestic employees only, strictly because they had a really great housing facility,” said Malitz.

She also found that the growers “who are just pure farmers do this program terribly,” since they focus on getting the crop in the ground and selling it later rather than investing in the professional personnel needed to handle payroll records and other human resources tasks for H-2A.



Jeanne Malitz, Malitzlaw, Inc.

“If you come in with a large group the first time you ever use the program, your fines can be enormous,” said Malitz. “It's so complicated that you're guaranteed to make some mistake.”

Lugo found that the most egregious H-2A violators, with the lowest level of compliance, are those just entering the program.

“It's rare for us to do an H-2A investigation and not find a violation,” he said. “Those H-2A employers that have been in business and have been using the program for years are most likely to be at a higher level of compliance.”

When the pandemic struck, many of the H-2A employers Malitz works with spent all of their profits on hiring more personnel, including safety managers as well as nurses and other medical professionals. Despite the precautions, employers faced difficult situations.

Malitz awoke early one morning to a phone call from the coroner's office in Tijuana, Mexico. An H-2A worker in California who tested positive had panicked, broke his quarantine by sneaking out of the employer-provided housing at night, and drove to Mexico in a van with three others. He died of pulmonary heart disease in a Tijuana bus station.

“It's a horrifying lesson to be learned,” said Malitz. “What could the employer have done differently? Nothing.”

Malitz reached out to Mexican consular offices asking for help with workers who were very scared and could flee home, risking the safety and health of their families and others along the way.

Another issue with COVID-19 last year was that workers were testing positive for the virus as soon as they arrived in the U.S. Claims for workers' compensation were rejected because they contracted the virus at home. The employers began a program of testing the workers twice in Mexico — two weeks ahead of the trip and again 72 hours before.

“Then we know they don't have COVID when they get here, or at least that's what we're seeing,” said Malitz.

Adding to that, California has had the most restrictive COVID-19 measures in the country, she said. The governing board for the California Division of Occupational Safety and Health, known as Cal/OSHA, approved a set of emergency standards in November to protect workers during the pandemic. A provision requiring six feet of spacing at all times, including for housing, drew heavy opposition from agricultural groups.

“It's extremely costly to have to double your housing,” said Malitz.

Cornelio Gomez, who manages foreign labor and farmworker services at EDD, said at least 25 applications are delayed each month as employers scramble to get additional housing to meet the requirements.

Yet Malitz has seen that going the extra distance to keep workers safe has often paid off. One employer she works with had an outbreak last week, with 10 employees who had just arrived testing positive. One had to be hospitalized and was later released but required a feeding tube. Since workers' comp did not cover the healthcare costs, the employer was not required to hire a nurse for the recovery. But the worker was not well enough to be left unattended or to return to Mexico. Malitz pushed the employer to either hire a nurse or work with a local farmworker clinic.

“Almost all of our employers now either have in-house medical personnel or have partnerships with clinics,” said Malitz, adding that many employees decline healthcare under the Affordable Care Act to avoid the pay deduction.

Lugo said that more effort is needed to educate workers on what health clinics are available.

“There are already lots of clinics that target agricultural workers,” he said. “The H-2A workers just are not familiar with the system.”

Lugo shared the story of a worker in Washington state who died in his housing when his medication ran out.

“I'm sure there'd be a few workers that would still be alive today, if they would have had access to medical care,” he said.

Cynthia Rice, director of litigation for the labor rights group California Rural Legal Assistance (CLRA), offered substantially different views on the program. She said H-2A is not complicated if employers treat workers with respect; follow state and federal requirements for housing, transportation and pay; and recruit U.S. workers first to fill job openings.

Rice and CLRA have often faced off against Malitz's clients in the courtroom, cases that Rice said are just the tip of the iceberg for violations under the program.



Ruben Lugo, DOL Wage and Hour Investigator

“We have successfully litigated, or negotiated settlements pre-litigation, or had labor commissioner complaints against most of those farm labor contractors,” said Rice. “This is a program that is designed to allow employers who would do so violate the law with not a lot of oversight.”

Rice said that once an employer makes the financial commitment to bring in H-2A workers, it “often means giving short shrift to U.S. domestic workers who have had those jobs in the past, or who would be available for those jobs.” She said in the Salinas, Imperial and Central valleys, which have the most H-2A workers in the state, domestic workers are on unemployment while jobs are being posted for H-2A workers.

The program was designed to fill in the gaps only when U.S. workers were unavailable. According to Malitz, employers were once required to first advertise in newspapers for positions, which was dropped “because nobody ever answered the newspapers.”

Rice argued the program is attractive to employers because it offers a captive workforce with “complete and total control.” The workers can’t “vote with their feet” by moving to another employer. They come into the country with debt load for the transportation costs that “isn’t always paid upfront.” COVID-19, she added, has exacerbated these issues.

“They’re fleeing a country way more hit by COVID than we are and that has been in an economic decline for a long time,” said Rice.

She also raised issues with employers who were allegedly setting limits on visitors in H-2A housing to avoid exposure.

“Not only is it where you go to work and when and where you live, it’s who can visit you,” she said. “That makes our outreach and our access extremely difficult.”

Despite California’s many worker protection requirements, Rice said most employers use boilerplate contracts that are inconsistent with state law.

“There’s nothing in 90% of the orders about California overtime,” said Rice. “It doesn’t include a word about the ALRB.”

She reported seeing overcrowded housing as well, despite the new Cal/OSHA regulations. Rice worried these problems will continue to grow as the state recruits more H-2A workers.

“The development of the H-2A program in, say, Florida, North Carolina, Georgia has inched up to get to a point where 90% of workers in sugarcane and tobacco is H-2A only,” she said. “And that is the trajectory I’m afraid that California is on.”

Those three states have led the country for the amount of jobs filled with H-2A workers, followed by Washington and California.

The takeaway for employers from both Rice and Malitz was that treating workers well leads to greater workforce retention. This means continual training by Malitz and her colleagues.

“We do not file paperwork and walk away, like some visa lawyers in other types of visa programs,” said Malitz. “I don’t take three hours to train. I don’t take eight hours. I take a whole season to train a new H-2A employer.”

California lawmakers want to protect agriculture by holding out-of-state farmers to the Golden State's standards

Two narrow bills in the California Assembly have ignited a much broader debate among lawmakers over protecting California farmers from competitors who are not held to such strict labor and environmental standards. The state's new and controversial animal confinement law, Proposition 12, may have opened up a new pathway for California to hold importers to those same standards, "leveling the playing field" for local farmers.

The debates have created unlikely allies among farm groups, environmentalists and labor advocates. For lawmakers friendly to agriculture, however, protecting farmers comes at the cost of adding further regulatory burdens onto other businesses, and for some trade groups it pits their members against each other.

"I'm just going to always fight for my farmers," said Assemblymember Cecilia Aguiar-Curry of Winters, in defending her bill on olive oil labeling last week in the Assembly Health Committee. "We continue to beat them up. I'm not going to beat them up. I want them to be successful and the California brand continue to be known throughout the nation."

Assembly Bill 835 would set guidelines for when olive oil producers could use the name California on their labeling. **Aguiar-Curry's bill would update a law on the books since the 1990s that prohibits the use of the term "California olive oil" on a label unless it is 100% from California. She argued that the company California Olive Ranch found a loophole in the law by not including "oil" in the name.**

"Just a few years ago, my opponents produced their product with 100% California olives," explained the lawmaker. "That product was changed shortly after tens of millions of dollars were invested by an East Coast endowment."

Now as little as 14% of the oil in those products comes from California olives, she said, arguing this deceives consumers and depresses olive oil prices in the state while putting growers at a disadvantage. Samantha Dorsey, president of McEvoy Ranch in Petaluma, said the bill aims to protect truth in labeling.

"You guys have done a really good job of setting the bar high with labor standards, emission regulations, water usage controls, food quality standards, inspections, payroll taxes, equipment, taxes, property taxes," said Dorsey to lawmakers in the hearing. "To be compliant in California, I have to charge a premium price for my product, because it's produced in a premium region. It's super disruptive to my business, and every other real California olive oil producer, when we have to compete against this foreign oil that's produced with fewer regulations at a significantly lower cost structure."



Bottles of olive oil.



Asm. Cecilia Aguiar-Curry, D-Winters

Also testifying in support was Carolyn Veal-Hunter, an attorney for the Yocha Dehe Wintun Nation, who said the tribe produces olives with an attention to detail and a Mediterranean climate that have helped to establish the Golden State's strong reputation for olive oil.

In an Assembly Agriculture hearing two days later, Asm. Eduardo Garcia introduced a bill that would also safeguard California's ideals "by ensuring their produce sold in the state meets those same expectations that we've put on our own farmers here in California," he said.

"I don't believe that we've adopted these regulations to purposely hurt our farmers," said Garcia. "But clearly we've heard that it has caused a significant economic burden to some."

AB 710 would apply California's pesticide and labor regulations to a list of produce typically shipped from out of state: apples, asparagus, bell peppers, blueberries, dates, honeydew, lemons, melons, nectarines, olives and table grapes.

"AB 710 is a California farmworker bill, a California environmental bill, a California farmer bill," said Coachella Valley farmer Anthony Bianco. "Other states and countries are now capitalizing on our state's brave leadership in safety and living wages."

Bianco explained how the state has for nearly 40 years been reducing the chemical inputs that growers can apply, while other states and countries are allowed "to freely ship fruits and vegetables containing these very chemicals applied by farmworkers and soaked into their ground."

Bianco's concern has been shared widely in the industry, particularly after Gov. Gavin Newsom banned the use of the insecticide chlorpyrifos in the state in 2019.

Proponents said the bill would also protect farmworker livelihoods. **Hernan Hernandez, executive director of the California Farmworker Foundation, said the farmworker population of about 20,000 in the Coachella Valley has dropped by 60% due to crop production moving beyond state lines. This struck a chord with conservative lawmakers.**

"Since I've been in this building, the regulations and the burden that we put on California ag and the requirements that we impose on them are tremendous," said Republican Asm. Heath Flora of Ripon. **"There is a cost to doing business in the state of California that sometimes, in my opinion, is really egregious and quite frankly aggressive."**

Flora was encouraged by the focus on farmers but raised concerns over product shortages if California farmers could not fill the loss in imports resulting from the added regulations. He also worried about costs to small mom and pop distributors who could be fined for not having adequate documentation, and said it would be felt by shoppers as well.

“Make no mistake about this, this is going to be a cost increase to the consumer,” said Flora. “There’s a balance to all of this.”

Opponents argued the bill would make it impossible to import the listed products and it would potentially violate interstate commerce laws.

“California has the highest minimum wage in the country,” said Leticia Garcia, who directs government relations for the California Grocers Association. “And we do not have control of how other states and countries set the minimum wage.”



Asm. Eduardo Garcia, D-Coa

Republican Asm. Jordan Cunningham of Paso Robles added that it may violate international treaties as well.

Eduardo Garcia responded that the bill specifically focuses on the issue of health and safety and not the economic circumstances that intersect with Commerce Clause concerns. He said precedent already exists for this with Prop. 12 as well as Prop. 2 in 2008, which added spacing requirements to the confinement of egg-laying hens. Those laws hold the same restrictions to certain imported products.

Republican Devon Mathis of Visalia shared the same concerns on commerce but maintained that agriculture in California “is extremely important” and small growers should be the focus.

“We see a lot of our normal agricultural association allies not showing support or opposition on this bill,” said Mathis. “What are we doing for the California grower? Not for the association.”

Democrat Jacqui Irwin of Thousand Oaks agreed.

“I see lemons on the list, but I don’t see Citrus Mutual on the support list,” she said.

Garcia said that other producers wanted to support the measure but their associations were conflicted. He acknowledged the efforts of the California Farm Bureau, Western Growers and others representing fruits and vegetables in helping to craft the list.

Protecting the California brand was front of mind for Flora as he sat on the Health Committee and considered Aguiar-Curry’s bill.

“This particular olive oil is becoming the nexus for this fight,” he said. “It’s the tip of the spear. And I do believe that is unfortunate.”

Flora felt the company was following the law in properly labeling its products. **California Olive Ranch CEO Michael Fox explained the shift to blended olive oil was a way to make up for a supply shortage due to an unseasonably cold winter.**

“Our biggest challenge has been the fact that our olives are alternate bearing,” said Dan Kennedy, a farmer partner with California Olive Ranch, “which makes it hard for marketing our crop on a consistent level without bringing the other products to help supplement the off years.”

Fox said the launch of the new “global” blend helped drive up the price per liter of 100% California products by 28% over the next two years, with the company’s California growers selling 123% more liters today. Fox dismissed Aguiar-Curry’s bill as “a philosophical disagreement with our business strategy” from his competitors.

“There’s a lot of agreement on both sides,” said Republican Asm. Frank Bigelow of O’Neals. “With respect to this, they all want to protect the brand.”

He said the issue comes down to a federal trademark dispute and worried the bill could preempt FDA labeling laws and lead down a slippery slope.

“Do we want to pick on other things that say California, like California Pizza?” asked Bigelow.

Aguiar-Curry pushed back, saying her bill would simply adjust an existing law but at the heart it is a fight for California farmers—a sentiment that Bigelow shared, though he abstained from voting on the measure.

“You and I are very good friends,” said Bigelow. “And so this is an odd place for us to be.”

India gobbles California walnuts amid marketing campaign

India is buying more California walnuts than it ever has, but West Coast farmers see a vast potential for even more trade as they wrap up a new media campaign in the Asian giant that is home to 1.3 billion people.

In one of the new ads produced by the California Walnut Commission to win over Indian consumers, a young girl plucks a walnut from a bowl and pops it into her hesitant father’s mouth and then smiles when he approves. It’s part of a campaign funded by the USDA’s Agricultural Trade Promotion Program, which is meant to counter the effects of foreign tariffs and India has plenty of those.

“India is definitely one of the markets where we are facing tariffs and we felt that we could do an advertising program based on research we had done,” says Pamela Gravier, senior marketing director for the California Walnut Commission. That research, she added, showed that “if consumers saw walnuts on television, they were more inclined to purchase them.”

It’s unclear how big of a factor the television ads will be, but it’s plain to see that Indians can’t get enough of walnuts and the country is importing millions of tons of them despite very high tariffs.

India lifted a ban on walnut imports about seven years ago and the country has been a major market for California farmers ever since.

They shipped 15,857 short tons of their 2016-17 (Sep-Aug) crop to India in what looked like just another year of increasing trade, but that wasn’t the case. Sales of the 2018-19 crop to India dropped sharply after India raised its tariffs sharply, said Gravier.

India was just one of the countries that the U.S. hit with steel and aluminum tariffs. India was also one of many countries that retaliated with its own tariffs and it coupled that retaliation with a drastic increase to its base Most-Favored-Nation tariff that applies to all of the country's walnut imports.



Walnuts growing in a tree.

India slapped a 20% tariff on U.S. walnuts, among other U.S. commodities. India also raised its base MFN duty from 30.9% to a whopping 100%.

Hit with tariffs totaling 120%, California exported only 11,539 tons of its 2017-8 walnut crop to India and that dropped further to 7,241 tons for the 2018-19 crop.

But that's when the situation changed. India's middle class has been on the rise, injecting more disposable income into the market and it was during the pandemic that consumption of walnuts – deemed a

healthy treat in a country that loves fruits and nut – began increasing.

California sold 10,806 tons of its 2019-20 crop to India, reversing the downward slide.

“India is a country that has been going through socio-economic changes over the last 15 years,” Graviet said. “You have a large middle class and those consumers are looking for a wider variety of quality foods ... We know there is a large growing middle class that is looking for healthy food options for themselves and their families and walnuts are one of those options.”

It is apparently an option that more and more Indians are choosing. The U.S. has already exported more walnuts in the first seven months during the 2020-21 crop year that it exported for the entire 2015-6 crop year. The latest data tracked by the California Walnut Commission shows India imported 20,345 tons of U.S. walnuts from Sept. 1 through March 31, said Graviet.

Even with Indian walnut consumption and U.S. exports on the rise so sharply, the media campaign is import in the push to get more people in the country eating the nuts, says Graviet. She pointed to data from the International Nut and Dried Fruit Council that shows that India's per capital consumption of walnuts is the lowest in the world.

The Commission says its “goal is to educate consumers on the health benefits of walnuts and how to incorporate them into everyday life.”

Still, India's tariffs remain a major barrier that the Commission hopes will be removed.

“We're still arguing that those need to be addressed,” Graviet said. “With the second largest population in the world, overall consumption is really low and there's tremendous room for growth.”

Senate Ag looks to jump-start climate action, facilitate ag carbon markets

The Senate Agriculture Committee is moving quickly to advance a carbon market bill that would deliver a rare bipartisan win on climate legislation even as President Joe Biden is trying to convince world leaders that the U.S. is serious about slashing greenhouse gas emissions.

The Senate panel is scheduled to vote Thursday on the newly revamped Growing Climate Solutions Act, which would lay the groundwork for ag carbon markets by putting USDA in charge of creating a program to certify credit verification services and technical assistance providers.

Thursday is the same day Biden is set to convene an online summit of global leaders on climate policy. Biden is expected to use the summit to release a new U.S. pledge for reducing greenhouse gas emissions by 2030; he will reportedly commit the U.S. to slashing U.S. emissions in half in comparison to 2005 levels.

The new version of the Growing Climate Solutions Act, or GCSA, has 34 Senate cosponsors, including 15 of the 22 Ag Committee members.

The bill includes a new section aimed at protecting farmer rights and additional provisions intended to ensure the needs of beginning and minority farmers are considered. The makeup of a USDA advisory committee, which would have extensive authority to shape certification requirements and responsibility for continually reviewing the program, also has been overhauled to ensure that a majority of members are farmers, ranchers and private forest owners. Under the original bill, the committee would have had at least 25 members, 10 of whom would have been from agriculture.



Senate Ag Committee Chair Debbie Stabenow, D-Mich.

For now, the bill is being considered separately from Biden's \$2.7 infrastructure package, the American Jobs Plan, which faces strong opposition from Republicans both because of its size and because it is funded through corporate tax increases.

The path forward beyond Thursday's committee vote for the GCSA isn't clear, especially since it isn't certain yet how Democratic leaders intend to handle the infrastructure package, which is the main legislative vehicle for his climate policy.

"I'm confident we will get floor action," Senate Agriculture Chairwoman Debbie Stabenow, D-Mich., told reporters on Tuesday when asked about prospects for the bill. "I'm not sure exactly how that's going to happen, we will obviously want to move it sooner rather than later."

She said that Senate Majority Leader Charles Schumer was "very, very supportive" of moving the bill.

Stabenow confirmed that she is separately working to ramp up conservation funding in the infrastructure plan. Biden’s proposal included relatively little funding for conservation beyond \$1 billion proposed for “agricultural resources management” and a separate proposal to spend an unspecified amount on drought resilience.

“There's more work to do to get additional dollars” for “conservation programs that are widely used and supported” by farmers and foresters, she said.

Indiana GOP Sen. Mike Braun, who co-authored the bill's original version, told reporters that moving the new GCSA should open the door to other bipartisan climate bills. **"There are bills that are going to come into play once this cracks the threshold," he said.**

The GCSA faces strong opposition from some on the left, and plenty of skepticism among some conservatives, including members of the House Agriculture Committee.

The House committee’s top Republican, Glenn “GT” Thompson last week called the GCSA “a complex solution in search of a problem,” and he questioned whether a lack of technical assistance was a barrier to carbon markets.

Two House Agriculture Committee members, Reps. Abigail Spanberger, D-Va., and Don Bacon, R-Neb., plan to introduce a similar version of the bill in the House.

Numerous progressive groups, including environmental groups such as Friends of the Earth, sent a letter to lawmakers last week, urging them to oppose the GCSA. By facilitating ag carbon markets, the bill would “allow greenhouse gas emissions to continue unchecked and would undermine efforts to build a healthy, sustainable, and resilient food system,” the letter said.

However, the bill has support from some environmental groups, including the Environmental Defense Fund and National Wildlife Federation, and the measure's co-sponsors include one of the Senate's most vocal advocates of acting on climate change, Sen. Sheldon Whitehouse, D-R.I.

"It's said that if you can build a good brick, you can build a city. And the brick that this legislation builds is enormously valuable and powerful," Whitehouse told reporters.

The new version of the bill reflects negotiations between Stabenow and the committee's top Republican, John Boozman of Arkansas.

Among the changes that were made was a requirement that USDA and the Environmental Protection Agency conduct an assessment of carbon markets before USDA decides to go forward with the certification program.

A new section of the bill, titled “Fair Treatment for Farmers,” would require USDA to ensure technical assistance providers and credit verifiers provide farmers with realistic cost and revenue estimates. The USDA-approved technical assistance providers also would be charged with helping farmers, ranchers and foresters to “receive fair distribution” of the revenue derived from the sale of carbon credits.



Sen. Mike Braun, R-Ind. (Photo: Joy Philippi)

To address concerns of minority farmers, committee members representing research universities would have to include one from a historically Black institution, and one of the three representatives from civil society organizations would have to include a representative of minority farmers.

After the program is running, USDA, EPA and the advisory committee would be required to assess the program every four years. USDA also would be required to report to the House and Senate Ag committees every two years on how the program is running.

The bill authorizes up to \$9.1 million in funding for USDA to operate the program. That includes \$4.1 million that would be immediately available out of the \$1.9 trillion economic stimulus plan enacted in March, plus \$1 million a year in additional funding for five years.

More than 60 organizations and corporations endorsed the new bill, ranging from Cargill, Danone and General Mills to the American Farm Bureau Federation and National Farmers Union. Numerous commodity groups also are backing the measure.

NFU President Rob Larew said the bill would address the lack of existing oversight for the “patchwork of carbon markets” that have developed. There also is no uniformity among the markets for “criteria, payment rates, or measurement, which can make selecting the right one a confusing and overwhelming process.”

US signals a turn to the green on trade and asks world to follow

The U.S. was one of nine countries critical of the European Union last year when it unveiled a plan to tax imports based on their carbon footprint, but that was under the Trump administration. Now the Biden administration is signaling a stronger kinship to the EU’s push to reduce greenhouse gas emissions on an international scale.

And U.S. farmers and ranchers will play a major role, according to U.S. Trade Representative Katherine Tai, who stressed recently that **“climate-friendly and sustainable agricultural production is essential to meeting our climate and sustainability goals.** Our farmers and ranchers can lead the world with innovative carbon conservation practices. (Agriculture Secretary Tom) Vilsack has proposed ambitious ideas, including expanding the use of cover crops and making carbon capture a mainstream conservation practice. I am eager to work with him to help make these practices the new global standard.”

Speaking last week to the Center for American Progress, a liberal think tank, Tai said U.S. producers need to lead the way on environmentally conscious trade, but they should not be disadvantaged in the global arena by foreign suppliers that provide the cheapest goods or commodities at the expense of the environment and global warming.

That kind of competition — what she calls “a race to the bottom” — needs to be done away with.

“The view that environmental issues are not an inherent part of trade ignores the reality that the existing rules of globalization incentivize downward pressure on environmental protection,” Tai said. “This puts countries with higher environmental standards at a competitive disadvantage ... It doesn’t have to be this way.”



USTR Katherine Tai

One way to create an economic incentive for trading partners to decrease their environmental footprint is to tax their goods on the carbon intensity tied to them, says John Podesta, counselor to former President Barack Obama, chief of staff in the Clinton White House and founder of the Center for American Progress, or CAP.

“Deepening economic ties and tackling climate change are not mutually exclusive,” said Podesta, who introduced Tai at the event last week when she promised environmental protection will play a bigger role than ever in U.S. trade policy. “In fact, it’s the opposite. The benefits of global trade can serve as a powerful incentive for raising environmental standards and creating a sustainable, global economy.”

It would be reasonable for countries or trading alliances to erect carbon adjustment taxes on imports if farmers and ranchers there have to operate under strict and expensive environmental regulations, says Joe Glauber, senior fellow at the International Food Policy Research Institute and a former USDA chief economist.

The European Union is considering a carbon adjustment tax as it prepares to require its agricultural sector to slash greenhouse gas emissions under its European Green Deal; several of the largest farm groups there are supporting the proposed duties.

A carbon tax on grain imports would be necessary to protect domestic farmers, according to the Belgium-based European Corn Federation and the France-based General Association of Corn Producers.

The European Green Deal and its environmental requirements will be “a threat if the EU does not take into account the economic and sectoral effects of its carbon policy compared to those carried out by its international competitors,” the groups said in a recent joint statement. “The EU’s low carbon approach will indeed create differences between European and third-country production systems if the latter countries do not make the same efforts.”

While Tai is emphasizing that environmental protection and climate change will play greater roles in future free trade agreements, she also set her sights on the need for change at the World Trade Organization, where there are no rules to protect nations that invest in counteracting global warming.

“While countries can avail themselves of what amounts to an affirmative defense, that defense has proven difficult to invoke successfully,” Tai said. “This is part of the reason why, today, the WTO is considered by many as an institution that not only has no solutions to offer on environmental concerns but is part of the problem.”

But the WTO can also be part of the solution too, says Glauber, so long as nations do not use the guise of environmental protection to create new barriers to imports.

The most potent thing the WTO could do, he said, would be to harmonize standards.

“When one country puts in one set of standards and another country puts in another — that’s where the friction is going to come ... and that’s where the WTO could help,” he said.

But it would be a major undertaking for an institution that has been unable to come to agreements on issues such as subsidies and market access for more than a decade.



Joe Glauber

In the meantime, U.S. leaders are saying it will ramp up its efforts to take a global leadership role in the fight against global warming and on protecting the environment.

“We must conserve the resources we do have — and work with our trading partners to do the same — to both mitigate and adapt to climate pressures,” said Tai. **“My job is to bridge that chasm and push for trade reforms that translate into meaningful change in the lives of farmers, ranchers, factory workers, parents, children — not just in the United States, but around the world.”**

Industry readies for implementation of USDA’s Dairy Donation Program

The Agriculture Department is releasing early the minimum requirements for a dairy donation program that’s much larger than one authorized by the 2018 farm bill, as USDA and the dairy industry hope to avoid another occurrence of last year's market disruption and milk dumping.

The fiscal 2021 omnibus spending bill enacted in December provided USDA with \$400 million to use for the new Dairy Donation Program, which reimburses processors that donate products to nonprofits, who then distribute food to needy Americans. The much smaller Milk Donation Reimbursement Program was authorized by the 2018 farm bill and funded with \$29 million over five years.

The expanded program "will, at a minimum, reimburse participating dairy organizations for the full value of the raw milk donated to make the dairy product, as opposed to a narrower reimbursement in the MDRP," Paul Bleiberg, senior vice president of government relations at the National Milk Producers Federation, told *Agri-Pulse*.

DDP is open to all dairy products, rather than just fluid milk as per the MDRP, he said.

The MDRP allowed eligible dairy organizations to partner with nonprofit organizations that distribute food to low-income individuals and were allowed to apply for and receive limited reimbursements to cover expenses related to certain fluid milk product donations.

Under DDP minimum requirements, applicants must submit a donation and distribution plan and maintain records of donations USDA could audit. The program is open to dairy processors who purchase milk from producers serving a federal milk marketing order. FMMOs establish certain standards where dairy processors purchase fresh milk from dairy farmers supplying a marketing area, according to USDA's Agricultural Marketing Service.

No one wants to see a repeat of last April when producers began dumping milk because of coronavirus marketplace disruptions.

Michael Dykes, president and CEO of the International Dairy Foods Association, said the program should be viewed as an alternative to dumping milk rather than another commercial opportunity.



Michael Dykes, IDFA

“As we move closer into May (and) June, we’ll be into the peak of spring flush because cows tend to give more milk when the weather warms up,” he told *Agri-Pulse*.

He said IDFA has talked with USDA about making sure purchases are evenly distributed across the different classes of milk so there isn’t market distortion by using the donation program for only one particular class.

If there is a sudden collapse in butter or cheese prices relative to the price it was at the time when the butter or cheese was produced, then DDP will be activated, and processors may choose to donate the products rather than incur losses in inventory, said Marin Bozic, a dairy economist at the University of Minnesota.

“It’s specifically designed to be that way because we don’t know how the next six months will look. One can tell a rather positive story or scary story,” he said, as more restaurants and schools across the country consider reopening.

If fewer exports cause domestic supplies to grow, and high supplies push butter and cheese prices down, the DDP should provide a “soft landing” for companies, Bozic noted.

He also did not expect DDP to create spikes in cheese or butter prices the way USDA’s Farmers to Families Food Box program did in the summer of 2020.

In June, the food box program was up and running, and the average Class III price hit \$21.04 per hundredweight, while the Class I and IV prices remained at just over \$14 and under \$13 per hundredweight, respectively.

The food box program specifically required the distribution of cheese.

“At the start of the food box program, they were actively bidding for cheese that was already in short supply because a lot of cheese was committed for exports, and that’s what lifted the prices of cheese to record highs in some weeks and months,” Bozic said.

However, one hurdle that could complicate spending is if President Joe Biden removes the current public health emergency due to the pandemic.

“That may make it more difficult for USDA to use this program. Although the way the bill is written, there is a lot of discretion,” Bozic noted.

In February, U.S. milk production was 2.3% above last year when adjusting for the leap year, according to USDA’s National Agricultural Statistics Service.

Peter Vitaliano, chief economist at the National Milk Producers Federation, said there is usually enough milk available for donation purposes.

Vitaliano said a key question is how many eligible companies decide to participate in the program. Each one will have to assess its supply and customers’ needs before deciding whether they find the reimbursement rate attractive enough to bid into the program, Vitaliano said.

“We just don’t know that at the moment,” he told *Agri-Pulse*.

The department is expected to begin writing a rule, or formal set of regulations, for the program sometime this summer, Dykes said.

News Briefs:

LGMA Board backs pre-harvest leafy green testing. Members of the California Leafy Greens Marketing Agreement have backed a pre-harvest testing protocol aimed at preventing foodborne illness outbreaks commonly associated with production near animals. The guidance offers varied levels of testing to take place based on the proximity and size of the animal production sites or grazing lands near where the leafy greens are grown. The new framework recommends pre-harvest testing “on product grown on fields where ... elevated risk factors are present.”

“We are endorsing pre-harvest testing in direct response to FDA’s recent report on E. coli outbreaks associated with lettuce in 2020, which identified the recurring E. coli strain implicated in this outbreak to be a reasonably foreseeable hazard,” Dan Sutton, the LGMA chair, said in a statement. “We want to send a clear message to FDA that our industry is, in fact, taking additional measures to prevent outbreaks.”

Under the protocol, for instance, a concentrated animal feeding operation with more than 80,000 animals must be a minimum of 1 mile from the leafy green production, and testing will occur prior to harvest if the facility is less than two miles from the leafy green field, if there is an opportunity for water runoff through or from the CAFO to irrigation water sources, prevailing winds could potentially carry contaminants, or there is a filth fly infestation. The protocol adjusts its risk factors based on CAFO size and also includes recommendations if the fields are near grazing lands or hobby farms with non-commercial livestock where water runoff and soil leaching is a possibility

Arcadia Biosciences buys food ingredients firm to advance hybrid cereals. Davis-based Arcadia Biosciences purchased the assets of Agrasys S.A., a Barcelona, Spain-based food ingredients company that developed tritordeum, a nutritious cross between durum wheat and wild barley. The proprietary hybrid cereal crop is high in fiber, protein and lutein, and can be used in bread, crackers, pasta and beer. Lutein is a carotenoid with anti-inflammatory properties that is known to improve or even prevent age-related macular degeneration, a leading cause of blindness and vision impairment, Arcadia said. "Not only do we see further growth for tritordeum in Europe, we believe that there is untapped potential for the product in North

America and other important cereal markets around the world," said Arcadia CEO Matt Plavan [in a news release](#). "Additionally, the network and capabilities that the Agrasys team have built will serve as an excellent foundation for our GoodWheat products as we expand our commercial footprint. We are delighted to welcome the Agrasys team into the Arcadia family and look forward to continuing to deliver the nutritious and delicious products that consumers seek." Agrasys works with a network of more than 50 grain producers and 25 millers and distributors to deliver its proprietary products to customers. The company has commercialized Tritordeum in 10 countries with seven retailers in Europe, most recently launching its Tritordeum bread product with Albert Heijn, the largest grocery retailer in Holland.

CDFA expands farm to school initiatives. The California Department of Food and Agriculture Office of Farm to Fork is awarding \$8.49 million in grants to 60 farm to school projects throughout the state via the 2021 California Farm to School Incubator Grant Program. In Track 1, or the California Farm to School Innovation Grant, CDFA will fund 46 projects, awarding grants ranging from \$20,000 to \$500,000 to local educational agencies (LEAs) throughout the state. Selected through a competitive process, these projects focus on establishing new or expanding existing integrated farm to school programs that procure California-grown or California-produced whole or minimally processed foods and integrate these foods into school meals; and coordinate educational opportunities between cafeteria, classroom and community. In Track 2, or the California Regional Partnerships Grant, CDFA will fund 14 projects, awarding grants ranging from approximately \$144,000 to \$250,000 to innovative farm to school partnerships including LEAs and regional partners. Selected through a competitive process, these projects focus on expanding existing farm to school initiatives and increasing collaboration and coordination between producers and the schools they serve. "We're happy to report that so many projects are being funded in our inaugural year of the California Farm to School Incubator Grant Program," said CDFA Secretary Karen Ross. "The excitement to participate demonstrates how much the program goals resonate with school meal providers, educators and regional food system partners." For a full list of awardees and projects, go to the [California Farm to School Program webpage](#).

USDA extends free school lunch waiver through June 2022. The Department of Agriculture has extended certain school lunch flexibilities through the 2021-2022 school year including a waiver to allow schools to provide free meals to all children. The waiver extensions carry through June 30, 2022; they were [previously set to expire](#) Sept. 30, 2021. Ag Secretary Tom Vilsack called the move a "win-win for kids, parents and schools." "States and districts wanted waivers extended to plan for safe reopening in the fall. USDA answered the call to help America's schools and childcare institutions serve high-quality meals while being responsive to their local needs as children safely return to their regular routines," he said. "This action also increases the reimbursement rate to school meal operators so they can serve healthy foods to our kids." Specifically, Tuesday's action allows schools to serve meals through the Seamless Summer Option, which is typically only available during the summer. This allows for the free distribution as well as higher-than-normal reimbursements, "which will support them in serving the most nutritious meals possible while managing increased costs associated with pandemic-related operational and supply chain challenges," the department noted in a [release](#). The School Nutrition Association, which represents school nutrition professionals, cheered the move. "These waiver extensions will ensure hungry students can receive the meals they need to succeed next school year," said SNA President Reggie Ross. "School nutrition staff can focus on safely serving students without having to worry about meal applications or collecting payments. Families struggling to make ends meet will know their children are nourished and ready to learn."

Farm Hands West: Newsom appoints California's regional water quality control board

Gov. **Gavin Newsom**, D-Calif., has appointed **Beatriz Gonzalez** and **Vivian Perez** to the Colorado River Basin Regional Water Quality Control Board. Gonzalez has served as district coordinator of expanded learning programs at the Coachella Valley Unified School District since 2011 and has served in several positions there since 1995. Perez has been center manager at Planned Parenthood of the Pacific Southwest since 2016 and a faculty member at the University of Phoenix since 2010. **Essra Mostafavi** has been appointed to the Lahontan Regional Water Quality Control Board. Mostafavi has been founder and chief executive officer of Geode Environmental Inc., since 2017. **Donald Young** has been appointed to the San Francisco Bay Regional Water Quality Control Board. Young has been a senior vice president at Salas O'Brien since 1998.

Julia Montgomery has been reappointed as general counsel at the California Agricultural Labor Relations Board. She has served in the position since 2016. In her career, Montgomery has held several positions at the California Department of Fair Employment and Housing from 2013 to 2016 and was a managing attorney at the California Rural Legal Assistance Foundation Inc., from 2002 to 2013.



Julia Montgomery

Blue Diamond Growers has selected **Daniel Sonke** as the new director of sustainability. Sonke most recently led corporate sustainable agriculture programs for Campbell Soup Company as director of sustainable agriculture. Sonke currently serves as a member of the Almond Board of California's Sustainability Working Group.

Church Brothers Farms has hired **Bob Licker, Andy Abbott, Shayne Gordon, Dan Walker** and promoted **Elia Lopez** on its sales team. Licker has over 44 years of experience in the foodservice industry and will focus on foodservice sales for Church Brothers Farms. He was most recently at Mann Packing as the Northeast regional manager for foodservice. Abbott and Gordon were brought on as contract sales managers. Walker joined the company as a sales support specialist. He brings 19 years of experience in finance and seven in the produce industry. Lopez was promoted to planning and logistics manager for the company's San Luis plant in Mexico. She has been with Church Brothers Farms since 2002.

Jesse Melgar has left the office of Governor **Gavin Newsom** where he served as the head of communications. Melgar previously served as the head of communications for now Sen. **Alex Padilla**, D-Calif.

Robert Bonnie has been nominated by President **Joe Biden** to be the next USDA undersecretary for farm production and conservation programs. Bonnie has been serving as Agriculture Secretary **Tom Vilsack's** chief climate adviser. Bonnie was the co-chair of the Biden administration's transition team for USDA and has previously spent time as the vice president for land conservation at the Environmental Defense Fund. To read more on Bonnie, click [here](#).

President Biden announced his intent to nominate **Sarah Bianchi** and **Jayne White**, both as deputy United States Trade Representatives. Bianchi's past work experience includes spending nearly a decade in government roles in economic and domestic policy, including in the Office of the Vice President, the White House Domestic Policy Council, the Office of Management and Budget, and the Senate Health, Education, Labor and Pensions Committee. In 2011, Bianchi was appointed by then-Vice President Biden as his head of economic and domestic policy in the White House, where she ran the economic and domestic policy team in the Office of the Vice President. White has served in the U.S. Senate since 2009, including as the chief trade adviser for the Senate Committee on Finance since 2014. He first came to D.C. to work for his hometown member, former Rep. **Jim McDermott**, D-Wash., who served on the Committee on Ways and Means. Since then, he has played a role in nearly every major trade issue and trade legislation, over the last 20 years.



Robert Bonnie

At the Interior Department, President Biden has nominated **Tanya Trujillo** as assistant secretary for water and science; **Tommy Beaudreau** as deputy secretary; **Shannon Estenoz** as the assistant secretary for fish and wildlife and parks, and **Winnie Stachelberg** as the assistant secretary for policy, management, and budget. He also said he plans to nominate **Christopher Coes** as the assistant secretary for transportation policy at the Department of Transportation; **Meera Joshi** as the administrator of the Federal Motor Carrier Safety Administration; **Faisal Amin** as the chief financial officer of the Environmental Protection Agency; **Radhika Fox** as the assistant administrator for water at EPA, and **Michal Ilana Freedhoff** as the assistant administrator for chemical safety and pollution prevention at EPA.

U.S. Trade Representative **Katherine Tai** has appointed **Elizabeth Baltzan** to serve as one of her senior advisers. Baltzan previously served as an attorney at USTR from 2003 to 2009. In 2009, Baltzan joined the Office of International Affairs at the Public Company Accounting Oversight Board and in 2012, she was detailed to the Senate Permanent Subcommittee on



Mikayla Bodey

Investigations, where she investigated banking practices. Baltzan then served as Democratic Trade Counsel for the House Ways and Means Committee from 2012 to 2016. She later returned to USTR to work on litigation matters and in 2017 she formed her own trade consultancy practice. She was also a fellow at the Open Markets Institute.

Mikayla Bodey has joined the Senate Ag Committee as professional staff to the majority. Bodey will handle the rural development and energy portfolio. She previously worked for Rep. **Angie Craig**, D-Minn., as her senior legislative assistant covering the portfolio for the House Ag Committee and the House Committee on Energy and Commerce. She also oversaw the congresswoman's work as co-chair of the

Congressional Biofuels Caucus. Before working for Craig, Bodey worked for former Sen. **Claire McCaskill**, D-Mo., as a legislative correspondent with a focus on agriculture and environment issues.

Brenda Mallory has been approved by the Senate to be President Biden's choice to lead the Council on Environmental Quality and become the first African-American woman to serve as the CEQ chair. She brings nearly 40 years of experience in environmental law and policy, first beginning her environmental law career in private practice, where she gained early experience in the application of the National Environmental Policy Act. In 2000, she joined the Environmental Protection Agency in its Office of Wetlands Oceans and Watersheds. At EPA, she also served as the senior career official and chief operating officer of the Office of General Counsel. During the Obama administration, Mallory served as the general counsel for CEQ.

Michael Torrey Associates has brought on **Danielle Nelson** as the director of government affairs. Before joining the firm, Nelson was the director of public policy at the Agricultural Retailers Association. Nelson has also previously served as the director of congressional relations for the National Pork Producers Council.

Nutrien has tapped **Mayo Schmidt** as the new president and chief executive officer of the company and **Russ Girling** as the new chair of the board of directors after Chuck Magro announced he is stepping down. For more details, [click here to read the story](#).

Hans Kabat has been tapped to be the group leader and president of Cargill's North American protein business, effective May 1. He succeeds **Jon Nash**, who was named president of the company's global protein and salt enterprise in March. In 2001, Kabat joined Cargill and has worked in leadership roles in the United States, China, Thailand and Canada. Kabat currently leads Cargill's protein business in Asia and Europe.



Mayo Schmidt

FMC Corporation has added two new staff members to its North America government and industry affairs team. **Elizabeth Boylan** joins as the new director of government and industry affairs. Most recently, she ran the D.C. office for Solvay's North America government affairs team. **Darryl Blakey** joined FMC as the new associate director for state government affairs in the U.S. Blakey recently served as the policy adviser to the chairman and associate director of the Office of Legislative & Intergovernmental Affairs at the Commodity Futures Trading Commission.

Mariah Wollweber is the new director of communications and partnerships at the National Association of Wheat Growers. Wollweber is a fifth-generation wheat farmer from Washington state. The past five years she has worked in the communication industry and comes to NAWG from the Denver Regional Council of Governments, where she was a public relations specialist.

Miguel Navarro has been hired by K·Coe Isom, a food and agriculture consulting and accounting firm, as its new global assurance leader. He brings more than 25 years of experience in strategic assurance and risk management initiatives after working in roles with Wal-Mart and Koch Industries. Navarro is a certified internal auditor, certified healthcare safety professional, and has a leadership circle profile certification.

JBS hired **Kevin Arquit** to the newly created role of chief legal officer. He will be responsible for leading all legal, ethics and compliance efforts for the company in the United States, Canada, Mexico, Australia, Europe and the UK. **Kim Pryor** will remain the general counsel for JBS in the United States. Arquit most recently served as a partner at Kasowitz Benson Torres. Prior to that, he was a partner and co-head of the global antitrust/competition practice at Weil, Gotshal & Manges LLP.

The National Rural Electric Cooperative Association (NRECA) has named **Ashley Slater** to lead its regulatory advocacy programs, effective May 24. Slater most recently served as vice president of government affairs and policy for PNGC Power, a Portland, Oregon-based generation and transmission cooperative. Before that, Slater was senior principal of legislative affairs for NRECA.



Mike Hostetler

Sarah Sieman and **Isidora Jimenez LaCasse** have joined the Ecosystem Services Market Consortium. Sieman is the new chief financial officer. She most recently spent four years at Sempra Energy. Jimenez LaCasse is the new financial manager. She has previously worked for many Fortune 500 companies, where she used her French and Spanish language skills managing the company's international banking relationships.

Mike Hostetler has been hired to the newly created position of director of consumer insights at the American Egg Board. He brings more than 15 years of experience, and most recently worked for Perdue Foods, where he was the director of insights and analytics.

Pluton Biosciences has promoted **Brian Throm** to Head of Business Development and has hired **Ben Wolf** as the lead scientist on the company's carbon sequestration venture with Bayer AG. Throm joined Pluton in 2019 and most recently was head of business development. Wolf got his PhD in plant and microbial biosciences from Washington University where he studied how novel microbes utilize far-red light to power oxygenic photosynthesis.

Former President **Jimmy Carter**'s vice president, **Walter Mondale**, died at the age of 93. Before serving in D.C., Mondale was tapped at the age of 32 to serve as Minnesota's attorney general in the early 1960s. In 1964, he was appointed to the Senate after **Hubert H. Humphrey** was elected vice president and vacated one of Minnesota's seats in the chamber. During his 12 years as a senator, he served on the Finance Committee; the Labor and Public Welfare Committee, the Budget Committee, and the Banking, Housing and Urban Affairs Committee.

Former U.S. Forest Service economist, **Harold "Ed" Dickerhoof**, passed away March 30 from congestive heart failure and kidney failure. He was 84. Dickerhoof analyzed forest product markets, trade and technologies and also served as a science and technology policy adviser to the White House Office of Science and Technology Policy and to the U.S. Trade Representative during the negotiations of the North American Free Trade Agreement. He began his career in 1965 at a forest sciences lab in Athens, Ga., later moving to D.C. to work at the headquarters. He

was there for 27 years until his retirement in 2009. Dickerhoof also served as president of the Organization of Professional Employees of the Department of Agriculture.

GoldenSun Insights founder and former owner, **Don Goodwin**, died April 18. He was 58 years old. Goodwin began his career at Western Michigan University's Food Distribution Program. In 1998, Goodwin led Target's produce division with the rollout of Super Target. He also served as the chief operating officer of Green Giant Fresh. In 2004, Goodwin founded GoldenSun Insights. He was known for his quick wit, charismatic personality, and facilitating the planning process of various companies in the supply chain. A funeral service for will be held April 23 at St. John's Lutheran Church in Mound, MN, for close family and friends. A celebration of life will be held later in July. In lieu of flowers, the family requests memorials be made to the Multiple Myeloma Foundation.

Best regards,

Sara Wyant
Editor

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