

**USA Dry Pea & Lentil Council**  
**Policy Positions 2021**  
**Farm Policy**

*The USADPLC seeks to be included and treated equally with other farm program commodities in the area of farm and conservation program support.*

**1. Federal Crop Insurance Reform.** The USADPLC supports equitable Federal Crop Insurance programs for all 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 present level of support for Crop Insurance in 2021 Budget.
- b. **“Dry Pea” loss data.** Encourage RMA to establish accurate dry pea loss adjustment standards data for autumn and spring sown peas, lentils and chickpeas using studies and actual evaluations of pulses to more accurately represent losses.
- c. **Non-Futures Pulse Crop Revenue Program Insurance.** 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 projected price deadline for collecting data closer to the RMA Announcement date 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. **Enterprise per pulse crop type per county.** Request RMA allow Enterprise units per crop type, i.e. dry peas, lentils, or chickpeas, per county.
- g. **Enhanced Coverage Option.** USADPLC supports including pulse crops in Enhanced Coverage Option policies.

**2. Farm Bill 2018 Implementation-** USADPLC is working for full equality for pulse crops as commodities under Federal Farm Policy. The USADPLC supports:

- a. **Farm Bill 2018 Safety Net:** USADPLC supports farm bill programs that include pulse crops, ensuring equality with other program crops in the 2018 Farm Bill.
- b. **Pulse Crop Health Initiative.** USADPLC supports full funding of the Pulse Crop Health Initiative (PCHI). Funding of the PCHI at the authorized level will insure 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 focus of the PCHI is on three major goals using pulses—improving nutrition, improving knowledge of functionality and improving sustainability and productivity. USADPLC expects to play a key advisory role in working with the USDA-ARS, NIFA and USDA-REE to set up the PHI infrastructure, strategic goals, and performance measures. ***The USADPLC supports appropriated funding of the PCHI at authorized level in the 2018 Farm Bill of \$25.0 million per year for five years.***
- c. **School Pulse Crop Products Program.** USADPLC supports appropriated funding of the Pulse Crop Products Program (PCPP). Permanent funding of the PCPP will help insure that the program is set up to evaluate acceptability of pulses (dry peas, lentils, chickpeas and dry beans—both whole and as ingredients), identify suitable products for school lunches, evaluate adoption of pulses outside of school and evaluate the effects of the products on nutrition. ***The USADPLC supports appropriated funding of the PCPP for \$2.0 million per year for five years as authorized by the 2018 Farm Bill.***
- d. **Add “faba beans” to exemption to base acres.** The USA Dry Pea & Lentil Council requests that Section.1114. Payment Acres, paragraph (c) Effect of Planting Fruits and Vegetables.- be amended to include Faba (also called Fava) Beans as an exception to base acre reductions required by planting of Fruits and Vegetables.
- e. **Reduction in Paperwork.** USADPLC supports utilizing current business systems like email, texting, and



electronic communications to improve notifications and sign up procedures. The Council encourages sharing data 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 the Crop Insurance Agent.

**3. Childhood Nutrition Act Reauthorization:** Pulses are nutrient dense foods 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 that 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, current legislation limits the acceptable form to "whole cooked beans, dry peas, and lentils (with the exception of hummus)". 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 increased use of pulse crops in school meal programs as follows:**

- a. Continue requirements for minimum weekly servings of vegetables from subcategories including "BEANS AND PEAS (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 pastas.

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

**5. Continue to Include Pulse Crops in any future USDA Trade Damages Mitigation Programs.** The steel and aluminum tariffs created retaliatory tariffs on pulse crops in China, India, Canada and the EU. As a result, market prices for producers of dry peas, lentils and chickpeas have dropped by 20-35% over the market year 2017-18. USADPLC requests pulse crops, i.e. dry peas, lentils, and chickpeas be included in all three parts of the Trade Damages Mitigation Program, i.e. the Market Facilitation Program (MFP), the Food Purchase and Distribution Program (FPDP), and the Trade Promotion Program (TPP). Pulse Growers have lost over \$235 Million due to the loss in market prices and the industry needs all three pieces to help provide some financial relief.

**6. Requested reforms to FSMA Rules.** Although FDA has directed it's inspectors to exercise "Enforcement Discretion" until the regulations have changed, the USADPLC continues to push for final enactment of the following revisions, of the Food Safety Modernization Act (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 RAC (other than fruit and vegetable) intended for further distribution or processing; and 21 CFR 507.5 (g).
- d. **Pulses are harvested dried—not dried in processing.** Drop the designation of pulses as "dried/dehydrated RAC's [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 EPA & FDA conclude that drying a RAC causes it to become a processed food, unless that drying is for the purpose of facilitating storage or transportation of that commodity.

**USA Dry Pea & Lentil Council**  
**Policy Positions 2021**  
**Research**

*Research is the backbone of any successful farm commodity. USADPLC supports the efforts of Congress and the Administration to help farmers and America's economy by increasing the 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 the pulse crop research dollars in health information, functionality and sustainability.*

**1. Pulse Crop Health Initiative \$25,000,000 in 2018 Farm Bill.** The purpose of the PCHI is to find solutions, through research on pulse crops, to the critical health and sustainability challenges facing the U.S. and the world. The Initiative will focus on three major goals: 1) reducing obesity and related chronic diseases; 2) increasing food security; and 3) improving sustainability. The USADPLC supports permanent funding of the Pulse Health Initiative. This will require establishment of policy and procedures to establish goals, provide guidance, and prioritize the research funded through the PCHI. APA/USADPLC will participate in the establishment and administration of this initiative to help prioritize research efforts and meet the needs of our nation. ***The APA/USADPLC requests \$25 million per year for five years for the Pulse Crop Health Initiative in the 2018 Farm Bill to find solutions to the Health, Nutrition and Sustainability issues facing our country through research on pulse crops.***

**2. Research Plant-Based Food as source of Nutrients of Concern.** Nutrients of Concern, established by the Secretary of Ag, provide an important tool to focus agriculture and food research. USADPLC requests USDA devote a portion of the Agriculture and Food Research Institute (AFRI) competitive grants on using plant-based food as a source of nutrients of concern. Research should add investigations into nutrients provided by plant-based foods; development of processing, functionality, and bioavailability of nutrients in plant-based foods and food products; and improvement of nutrition and functionality of plant-based foods. Pulses, i.e. dry peas, lentils, chickpeas and dry beans would be plant-based foods that provide a major source of nutrients of concern. Congress re-authorized AFRI at \$700 Million annually in the 2018 Farm Bill and appropriated \$375 Million in FY 2016 and 2017; \$405 million in FY 2018; and \$415 million in FY 2019. Of the funds appropriated for AFRI, ***USADPLC requests \$25 Million per year for four years in FY 2021-24 for research in Nutrients of Concern.***

**3. Increase Base Level Funding for USDA-ARS.** The Pulse Industry has grown significantly over the past two decades, growing from nearly 1,500,000 acres in 2000 to over 3.5 Million acres of dry peas, lentils, chickpeas and dry beans in 2019. During this time period, base level funding of USDA-ARS scientific programs focused on pulse crops have at best remained stagnant or at worst been reduced. The USADPLC requests an increase to base level funding of \$4.5 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	\$ 1,000,000	\$ 5,000,000	\$ 6,000,000
<b>Total for ARS-Fargo, ND</b>	<b>\$ 1,000,000</b>	<b>\$ 5,000,000</b>	<b>\$ 6,000,000</b>
<b>Base Level Increase-ARS Pullman, WA</b>			
Grain Legume Genetics and Plant Physiology Research Unit			
Pullman Pathology, Pulse Breeding			
Prosser Pathology, Weeds, Pulse Breeding	\$ 2,440,097	\$ 4,500,000	\$ 6,940,097
Increase for Winter/Fall-seeded Pulse Breeder	\$ 120,000	\$ 630,000	\$ 750,000
Plant Germplasm Introduction Center (Wheat, 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	\$ 224,000	\$ 400,000	\$ 624,000
<b>Total for ARS-East Lansing, MI</b>	<b>\$ 224,000</b>	<b>\$ 400,000</b>	<b>\$ 624,000</b>
Base level increase to Sclerotinia Initiative			
<b>National Sclerotinia Initiative Increase</b>	<b>\$ 1,500,000</b>	<b>\$ 1,000,000</b>	<b>\$ 2,500,000</b>
<b>Total Request for USDA-ARS Base Level Funding</b>			
<b>Increase for National Pulse Research Funding</b>	<b>\$ 8,078,685</b>	<b>\$ 12,530,000</b>	<b>\$ 20,608,685</b>

**4. USDA/ARS Pulse Crop Quality Network \$6,000,000.** The USADPLC supports the immediate creation of 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. With the creation of the NDSU Pulse Quality Network at Fargo, ND, Pullman, WA and East Lansing, MI, the USDA-ARS Pulse Crop Quality Network will complement the efforts of the State and USDA-ARS Scientists focused on Pulse Quality across the country. With the additional base level funding, the ability to determine the overall quality of the crop, the relationship between genetics and quality traits such as cooking time and taste, and the ability to establish new uses for pulses could be expanded. ***The USADPLC requests a \$6,000,000 appropriation in FY 2021 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 quality lab facilities in the northern tier (WA, ID, MT or ND).***

**5. USDA/ARS Fall Seeded Pulse Crop Plant Geneticist Position \$630,000.** Dry pea, lentil and chickpea growers have a need for winter-sown cool season legumes in their crop rotation. Development of high-yielding fall seeded pulse varieties will help US growers remain competitive with rapidly expanding pulse acreage in Canada and Australia. This position would be established at the USDA/ARS Grain Legume Genetics and 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 2021 to fully fund a new USDA/ARS Winter Pulse Crop Plant Geneticist located in Pullman, WA.***

**6 Sclerotinia Initiative \$1,000,000.** For the past twelve years, the pulse industry has joined with soybeans, dry beans, canola, sunflowers and the USDA-ARS to manage an Initiative currently funded at \$1.5 million to combat Sclerotinia or “white mold”. This project receives industry input, selects competitive, scientifically sound research, and uses an outside review process to audit the progress toward goals. Reported outcomes include finding sources of resistance, improving basic knowledge about the pathogen, and exploring efficacy of management tools. Since formation of the initiative, additional genetic resources have become available such as the genetic map of soybean, medicago truncatula and the Sclerotinia pathogen itself. Over the past five years, the funding level has limited the ability of the initiative to provide producers important crop management tools. Current science includes potential biocontrol products and innovative genetic tools. ***USADPLC requests an increase to funding of \$1,000,000 to the Sclerotinia Initiative to a total of \$2.5 million for FY 2021; such funding would be included in any increase to the ASR baseline budget.***

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

**8. Pulse Crops (Grain Legume) Plant Introduction Center.** The USDA-ARS Plant Introduction Center at Pullman, WA houses all the genetic resources (germplasm) for pulse crops in the USA. The Center contains seeds for dry peas, lentils, chickpeas, lupine, faba bean, and dry beans (i.e. pulse crops). The genetic resources collected by this center provide a majority of sources of genetic diversity in pulse crops in the USA. This collection is critical to develop resistance to diseases, improve quality traits like protein content, and improve the quality characteristics of the crop. Current funding supports three full time scientists, the support programming for these scientists and support for the physical storage facility. ***USADPLC requests an additional \$1,000,000 to increase support for this critical facility.***

**9. 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) prior to arrival at Indian ports. The purpose of the fumigation is to prevent bruchids and nematodes from entering the country of India. India is the largest market for US dry peas and lentils and in the top 5 markets for US Chickpeas. US exporters are faced with US regulatory pressure to reduce MeBr use, technical problems due to labeled usage in US, and no effective alternatives to control the pests. ***USADPLC requests USDA-ARS focus the MeBr Alternatives Initiative on finding effective alternatives for fumigation of stored grains.***

**10. Dilated Cardiomyopathy (DCM) in Canines and Pulses.** The US FDA recently linked DCM in dogs to pulses in their diets. This created a significant market impact. The USADPLC strongly supports scientific research to investigate 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 should be based on sound science and clearly communicate the actions needed by consumers to keep their pets safe.

**USA Dry Pea & Lentil Council**  
**Policy Positions 2021**  
**Market Promotion**

*The US 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 legumes are exported overseas. In order to keep our rural economies strong, we need the Federal Government to join with our industry to aggressively promote our product. Congress and the Administration need to increase funding for market promotion for US farm commodities. Last year the pea, lentil and chickpea industry contributed over \$475,000 to MAP and FMD market promotion activities.*

**1. Market Access Program (MAP) \$400 million.** MAP is an effective program for the US pea, lentil and chickpea industry. Strong market promotion programs are critical to increasing the demand for our commodities around the world. MAP promotional efforts also resulted in increased sales to India, Latin America, Asia and Europe. The USADPLC fully supports the continuation of MAP. Effective market promotion programs are critical to the long-term financial health of US farmers. ***The USADPLC requests funding of \$400 million for Market Access Program in FY 2021 Appropriations.***

**2 Foreign Market Development (FMD) Program \$69 million.** The USADPLC has been a USDA Foreign Ag Service (FAS) Cooperator since the late 1960s. This market development program is jointly funded between the 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 million in FY 2021 Appropriations for the Foreign Market Development program.***

**3. Food Aid Funding \$1.9 billion.** P.L. 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. Peas, lentils and chickpeas provide an inexpensive source of protein, vitamins and minerals to those P.L. 480 recipients facing food shortages. The USADPLC strongly supports the P.L. 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 P.L. 480 customers. USADPLC supports continued funding for the PL480 and McGovern Dole programs in Farm Bill 2018. ***The USADPLC requests funding of \$1.9 billion in FY 2021 Appropriations to fund P.L. 480 Title II & 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. We support enforcement of current trade agreements already in place.

**5. Trade Barriers.** The USADPLC will continue to work toward its goal of reducing and/or eliminating unfair trade barriers. Top priority for the industry is elimination of phyto-sanitary issues for the following countries: a) India, b), China c) Canada, and d) 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 Bank Funding.** USADPLC supports full funding of the ExIm Bank. The service provided by this bank helps the industry to trade with many less developed countries and opens important markets for our products.

**USA Dry Pea & Lentil Council**  
**Policy Positions 2021**  
**Crop Protection Regulations**

If US pea, lentil and chickpea growers are to compete effectively, crop protection materials must evolve just as the pests they help control evolve. In addition, US producers must not lose markets due labeled use of crop protection materials which are more effective, less costly or reduced risk.

**1. Crop Protection Labels.** The USADPLC plans to work for labels for the following active ingredients. It is critical that these crop protection materials be approved by EPA as soon as possible:

- a. Work toward Section 3 Label for chickpeas and peas for **Ultra Blazer (Acifluorfen)** as post emerge herbicide.
- b. Section 3 Federal Label for **Omega® (Fluazinam)** for lentils (dry peas) through the IR-4 Program.
- c. Section 3 Federal Label for **BeLeaf® (Flonicamid)** in dry peas, lentils and chickpeas to control sucking insects like aphid and lygus bug.
- d. Federal Label for **Transform® (Sulfoxaflor)** insecticide on dry peas and lentils through 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 aphid in peas and lentils.

**2. Crop Protection Harmonization.** Improved crop protection tools are 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 newer 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 provide better access to trade through harmonization of international MRLs. **USADPLC supports efforts to create efficiencies at the Codex CPR.**
- b. **Harmonization of MRL's.** 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—EPA, IR-4, FAS and others to add MRLs for pulse crops to all our trading partners but particularly the CODEX.**
- c. **Use of Crop Groups:** Crop Groups in the USA are used to gain maximum use of residue testing. Multiple crops within one group are registered with the MRL established for a single “representative” crop. With this system, an MRL established with trials for dry peas can be applied to lentils and chickpeas. **USADPLC endorses efforts by US IR-4 and 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. International crop zones encourage international cooperation and joint registrations by combining work done in several geographic regions rather than just one country. **The USADPLC supports sharing both data and regulatory capacity through the use of expanded international crop zones and crop use patterns to evaluate residue data. USADPLC supports increases in capacity to improve the responsiveness for gaining CODEX MRLs.**

**3. IR-4 Program & Pesticide Registration \$21.0 million.** The USADPLC supports funding for the IR-4 program to assist in the registration of crop protection products for specialty crops. The USADPLC supports an appropriation of \$21.0 million in FY 2021 to fund IR-4 programs. In addition, the USADPLC supports continued funding of corresponding USDA-ARS programs in support of IR-4.

**USA Dry Pea & Lentil Council**  
**Policy Positions 2021**  
**Transportation Issues**

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

**Rail Transportation**

- 1. The USADPLC supports the review and monitoring of rules being established as a result of the Surface Transportation Board (STB) Reauthorization Act that was passed by Congress in December, 2015.** Specifically, the USADPLC supports recent rules allowing STB to streamline rate rulings and investigative issues.
- 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.

**River Transportation**

- 1. Dredging.** Adequate funding for maintenance and dredging of water transportation channels.
- 2. Dam Removal.** The USADPLC supports maintaining the current Pacific Northwest (PNW) river transportation system and opposes the removal of PNW dams.

**Trucking**

- 1. Hours of Service Exemptions.** USADPLC supports continuation of agricultural exemptions from hours of service rules at the state and federal levels.
- 2. Harmonizing Weight and Length Limits.** USADPLC supports legislation or regulations harmonizing weight limits and lengths on all federal highways at the highest safety level.
- 3. Electronic Logging Devices.** The USADPLC supports the current exemption for agproducers.

**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 USA.
- 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 re-establishment of Port of Portland container service.
- 3. Transportation Infrastructure.** Federal Highway Systems—bridges and roads, Port Access. Harmonization of heavy haul routes in all port areas. Port congestion reduction particularly movement of commodities through populated areas.

**USA Dry Pea and Lentil Council**  
**Policy Positions 2021**  
**FGIS & NASS Policies**

- 1. Monitoring Additional Pulse Grading Office.** The USADPLC supports the FGIS certification of ND private grading service and will continue to monitor the establishment of this services for the pulse industry.
- 2. Track chemical residues on Pulse Crops.** Maximum Residue Levels (MRLs) are becoming very important criteria for export to overseas customers. Over the last few years, the Industry has faced violations from MRLs in the EU and in Japan. Currently, there is no impartial scientific sampling of residues on pulse crops. US Wheat and other crops are sampled routinely for chemical residues by FGIS. The lack of this data leaves US pulse producers at a disadvantage to other competitor countries that routinely test their products. ***USADPLC requests that FGIS conduct random samples at several ports at least twice a year to determine the level of residues on pulse crops. USADPLC would assist FGIS to determine the panel of chemicals required for testing.***
- 3. Provide data in support of Fair Average Quality (FAQ) Determination.** USADPLC determines the FAQ of the pulse crop (i.e. 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 Infra-red (NIR) testing can easily measure protein in whole seeds. Processors of pulses are beginning to pay a premium for protein to pea producers and utilize all pulse crops as a source of vegetable protein. The industry needs an unbiased standard to help establish protein levels immediately in dry peas and as soon as possible in all pulse crops. FGIS needs to establish the calibration standard for measuring protein in pulses. ***USADPLC requests FGIS establish NIR calibration standard for protein in all pulse crops.***
- 5. Funding Stocks on Hand Reports in June and December and Seed Planted Report in June.** SOH report in June and December and Planted acreage reports for lentils and peas were eliminated by sequestration funding cuts. Congress restored funding for these reports in FY 2015. ***USADPLC requests that USDA find consistent source of funding for these critical reports, SOH in December and June and Planted Acres for dry peas, lentils and chickpeas in June.***
- 6. Standardize USDA statistical support for Pulses.** Currently, the classes of export products tracked by USDA Foreign Agriculture Service (FAS) are different than those tracked by USDA National Ag Statistics Service (NASS) in production and planting reports. In addition, the prices tracked by USDA Economic Research Service (ERS) are different than either the FAS or the NASS. Finally, the acres reported by 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) (Export Data) Dry split peas, green and yellow; 3) Lentils (green or regular), small, medium, and large; 4) Lentils, red (all sizes); 5) Chickpeas, Kabuli--small and large; and 6) Chickpeas, desi.***