National Oilseed Processors Association
Submitted to the House Agriculture Committee, Subcommittee on Conservation, Credit, Energy, and Research
December 2, 2009

The National Oilseed Processors Association (NOPA) offers its thanks and appreciation to Chairman Holden and Ranking Member Goodlatte for holding this hearing to review the potential economic impacts of climate change on the farm sector. NOPA also thanks you for the opportunity to submit for the record NOPA's views regarding the potential impact of global climate change legislation on the oilseed processing industry.

NOPA is a national trade association comprised of 15 member companies engaged in the production of food, feed, and renewable fuels from oilseeds, including soybeans. NOPA's member companies process more than 1.7 billion bushels of oilseeds annually at 65 plants located throughout the country, including 60 plants that process soybeans.

As your Committee begins consideration of global climate change legislation, we respectfully provide you with our perspectives on how such legislation may impact oilseed processors. Attached to our Written Statement is a document entitled "NOPA Estimates of Costs to NOPA Member Companies Associated with Global Climate Change (GCC) Legislation: Costs Due to CO2 Allowances and Increased Energy Prices ($1000s)" (see Attachment A). Also attached to our Written Statement (see Attachment B) is a letter to Chairman Holden and Ranking Member Goodlatte, informing them of the views of a coalition, of which NOPA is a member, including food, feed, ingredient, beverage, and consumer product processors, manufacturers, distributors, and retailers, on prospective climate change legislation.

Today, USDA will discuss the impacts of climate change legislation. NOPA believes the climate change legislation passed by the House will cause a significant restructuring of the U.S. economy and in particular agriculture from farm to fork. Conducting analysis on a dynamic and ever changing industry such as agriculture is no easy task. The climate change legislation being discussed today sets in law specific goals and targets that must be met through 2050. Assumptions play a key role in determining analysis and impact – because agriculture is so dynamic and ever changing, those assumptions will be subject to dissection and question.

With so many uncertainties and difficulty forecasting so far into the future, NOPA is concerned about the cost of allowances, increased energy cost, commodity cost, transportation cost, loss of productive cropland to trees and grass, acreage shifts, impact on livestock and poultry sectors, and compliance with our WTO obligations, to name a few.

While USDA and some of the other witnesses at today's hearing are discussing the impact of climate change legislation on farmers, NOPA believes analysis by USDA and the other witnesses should include the economic impact from farm to fork. Examples should include other ag-related industries such as processors (e.g., oilseed, meat processors), food manufacturers, ag equipment manufacturers, exporters, and transportation.

The assumptions used to estimate the cost of carbon allowances varies; Charles River Associates (CRA) International, in a May 2009 study, estimated carbon allowances at $22 CO2 per ton in 2015, $46 CO2 per ton in 2030, and $124 CO2 per ton in 2050. USDA, on the other

hand, has estimated $12.64 CO2 per ton in 2015, $26.54 CO2 per ton in 2030, and $70.40 CO2 per ton in 2050. The cost variance and implications are staggering: (1) carbon offsets are a potential income source for producers and forest landowners; this offset program could have a devastating impact on land use, taking productive crop land out of production and planting it to trees, thereby causing higher commodity prices and higher food prices for domestic and foreign consumers; (2) the cost of purchasing allowances by NOPA member companies on Day One is substantial – in the millions of dollars on an annual basis; and (3) acreage shifts will impact NOPA member facilities' ability to obtain soybeans for processing and could lead to higher transportation costs, impacting competitiveness for upstream customers and their ability to compete in domestic and international markets.

Depending on one's assumptions, some of USDA's preliminary analysis shows that in 2050: CO2 allowance cost per ton - $70.40; a loss of almost 60 million acres, of which 35 million acres comes from productive cropland and 24 million acres from pastureland; soybean acreage - 29% below current baseline; and hog production slaughter - 23% below current baseline. These assumptions could have a devastating impact on NOPA members' processing facilities, soybean farmers, livestock and poultry customers, other ag related businesses and, more importantly, the rural communities in which NOPA plants are located.

Our views and concerns are discussed below:

- **Direct Costs to Oilseed Processing Industry (Attachment A).** The American Clean Energy and Security Act of 2009 (H.R. 2454), Subtitle B of Title IV, defines "energy-intensive, trade exposed entities" (EITE) to include industrial sectors that have an energy or greenhouse gas intensity of at least five percent or a trade intensity of at least 15%. Entities meeting the EITE qualify for free allowances. NOPA members do not meet EITE. Without these allowances, firms in industrial sectors such as oilseed processing would incur energy-related costs that foreign competitors would not face, putting them at a significant market disadvantage.

  In the near term (2015-2019), NOPA members would spend an estimated $790 million on purchasing greenhouse gas (GHG) allowances and additional energy costs to operate their facilities – that's about $2.6 million per plant over that time period in additional annual operating costs. In the moderate term (2020-2024), NOPA members would incur an estimated $1.1 billion on allowances and additional energy costs – that's about $3.7 million per plant in additional annual operating costs. This means in the near-to-moderate term (2015-2024), NOPA members would incur nearly $1.9 billion in additional costs.

- **Loss of Productive Cropland.** NOPA members are extremely concerned about the unintended and problematic consequences of agricultural producers taking arable cropland out of production and converting it to grassland or trees to earn carbon offsets. USDA estimates that by 2050, land converted to afforestation would increase to nearly 60 million acres – 35 million from cropland and 24 million from pastureland. Any program that inadvertently incentivizes agricultural producers to take productive and environmentally sustainable cropland out of production to earn carbon offsets would devastate U.S. agricultural competitiveness and could severely strain the ability of the food, feed, and renewable fuels industry to meet worldwide demand.

Further analysis is needed to determine the impacts on agricultural production (including the livestock and poultry sectors), commodity prices, farm income, consumer food costs, and rural communities.

- **Impact - Unintended Consequences**. Our members, as well as one of their principal customers (i.e., animal producers), have limited ability to pass costs on to users/consumers of their products; thus, we (and they) are very concerned with any cost impacts on our industry, including costs for allowances and energy price increases associated with the legislation. To the degree that our members can pass costs on to their customers, the result would be higher food prices domestically and higher prices on the products our members (and, in turn, our customers) export to other countries. Higher prices would make our industry less competitive both domestically and internationally, resulting in reduced revenue for farmers, processors and livestock/poultry producers, loss of jobs within the food and related industries (e.g., logistics) chain, and increased food/feed prices for U.S. consumers.

  In circumstances in which our members cannot pass on these increased costs, they would experience higher operating costs at their facilities, rendering them less competitive both domestically and internationally. The result would be reduced revenue for both farmers and processors and the loss of jobs within the food and related industries chain.

  Higher operating costs and a less competitive business environment would result in a transfer of oilseed processing and related jobs, including animal production, to other countries and a transfer, not a reduction, in global GHG emissions. In fact, the climate change problem would be exacerbated to the degree that those operations are transferred to countries that use energy sources that are more carbon-intensive.

- **Underestimated Impact of Climate Change.** The impacts of climate change legislation on the food processing industry and transportation infrastructure, including the impacts of GHG mitigation policies, have not been studied adequately. A full review of the benefits and costs of carbon tax and cap-and-trade programs should be undertaken. In a high-volume, low-margin business like the one in which our members operate, domestic production can quickly move to foreign competitors, at the expense of U.S. production and jobs. If implemented in an aggressive or reckless manner, either a carbon cap-and-trade or carbon tax program would have disastrous economic consequences on the U.S. oilseed processing industry. Either program would result in food, feed, and renewable fuel prices increasing to such a degree that the industry could not absorb the associated costs, rendering the oilseed processing industry much less competitive on exports to foreign markets.

  For these critical reasons, NOPA opposes any unilateral climate-related legislation that calls for either a carbon tax or a mandatory cap on GHG emissions. We do not believe sufficient effort has been put towards the development of voluntary initiatives that provide the framework for effective, voluntary, pro-growth, technology-driven approaches to reduce energy use, and thereby achieve GHG reductions in an economically sound manner. We believe that global GHG emissions are best addressed

through voluntary initiatives, as well as through increased research, development and deployment of innovative breakthrough technologies. NOPA and its members are focused on solutions that will continue to promote U.S. agriculture and the food, feed, and renewable fuels industry.

- **Distribution of Allowances.** Any cost of allowances for entities that emit more than 25,000 tons of GHGs annually would be directly added to the operating cost of each facility. One can safely assume that firms necessarily would need to cover added costs by passing them forward in the supply chain. This inevitably would impact costs for consumers, returns for processors, or a combination of both. However, there comes a point when it is no longer possible to pass on all such costs in a globally competitive market. Therefore, without an appropriate allocation of allowances, processing firms in the United States may not remain viable.

  If a cap-and-trade approach is taken, we believe it would work best — both for the oilseed processing industry and all energy-intensive sectors — if allowances are distributed proportionately to each industry's emissions, thereby mitigating the direct and indirect impacts on all regulated industries. Such a proportionate allocation would be the fairest system, because it would avoid arbitrarily picking winners and losers and assist all industries in making the challenging transition to a low-carbon economy. A fair distribution of allowances would provide an appropriate percentage of allowances to the food, feed, and renewable fuels sector. It would also avoid the impression that the allowances represent subsidies to favored industries — an accusation that could subject the U.S. to World Trade Organization (WTO) disputes and American companies to retaliatory tariffs. We cannot demonstrate international leadership by approving GHG legislation that undermines our international credibility on trade liberalization.

- **Climate Change is a Global Challenge.** Climate change is a global challenge requiring multilateral solutions that do not shift the economic burden to agricultural production, processing, and manufacturing of food and feed products and renewable fuels. Rising energy costs commensurate with either a carbon tax or an emissions cap imposed on U.S. operations would threaten the viability of not only the energy-intensive, import/export-sensitive U.S. oilseed processing industry, but other sectors of manufacturing in the U.S., resulting in some companies facing the decision to move operations out of the country. Hence, legislation must ensure that developed and developing nations alike share responsibility for addressing climate change. Additionally, any emission reductions from such legislation must be verifiable and enforceable, particularly with respect to impacts on international trade.

- **World Trade Organization (WTO) Obligations.** Any U.S. carbon reduction program must be structured in a manner to protect our competitive advantage while being consistent with our international trade obligations under the WTO, recognizing that many of our competitors likely do not have similar policies in place. Structuring a program in this manner would be a huge challenge, considering our WTO commitments. Any U.S. carbon reduction program could lead to allocation schemes and trade mechanisms that could face WTO challenges, already a very complex problem. Designing a program/scheme to address "carbon leakage" without risking retaliation from our overseas customers would be a very difficult task. If the U.S. fails in this task,

the current global recession we are experiencing could be exacerbated by a wave of international protectionism.

- **Federal Preemption of Regional, State and Other Carbon Reduction Programs.** The oilseed processing industry supports federal preemption of all regional, state and other carbon reduction programs or, at a minimum, the harmonization of these climate initiatives. Any legislation that allows regions, states and other entities to pursue their own programs would only lead to confusion, multiple sets of recordkeeping and additional expense, all of which would serve to undermine regulatory effectiveness, create investment uncertainty, and negatively impact U.S. competitiveness. The objective should be to avoid unnecessarily driving up compliance costs and making environmental goals even more difficult to reach. To the degree that these other climate initiatives remain, it is paramount that they be harmonized with the federal program to eliminate the cost and chaos multiple independent systems would impose on the regulated sectors.

Conclusion

During these difficult economic times, it is unwise to insert additional economic uncertainties into an already fragile marketplace without full consideration of the consequences. In the event Congress acts to limit GHG emissions, a full review of the benefits and costs of the legislation should be undertaken.

Thank you for allowing NOPA to share its views on global climate change legislation. We look forward to working with you and members of the Committee in addressing the challenges and opportunities facing businesses across the country, but, in particular, rural businesses that serve domestic farmers and livestock and poultry producers.

NOPA
NATIONAL OILSEED PROCESSORS ASSOCIATION

CAP & TRADE LEGISLATIVE PROPOSALS: VERY COSTLY TO THE US OILSEED PROCESSING INDUSTRY

The National Oilseed Processors Association (NOPA) is an important stakeholder in the global climate change legislative proposals that are being considered by the U.S. Congress. NOPA is a national trade association that represents 15 companies engaged in the production of food, feed and renewable fuels from oilseeds, including soybeans. NOPA's 15 member companies process more than 1.7 billion bushels of oilseeds annually at 65 plants located throughout the country, including 60 plants which process soybeans.

Our members, as well as their customers (i.e., animal producers), have very little ability to pass costs on to users/consumers of their products; thus, we are very concerned with any cost impacts on our industry, including costs for allowances and energy price increases associated with the legislation:

- To the degree that our members can pass costs on to their customers, the result would be higher food prices domestically and higher prices on the products our members (and, in turn, our customers) export to other countries. Higher prices would make our industry less competitive both domestically and internationally, resulting in reduced revenue for both farmers and processors, loss of jobs for our members, and increased food/feed prices for U.S. consumers.

- To the degree that our members cannot pass on costs, they would experience higher operating costs at their U.S. operations, rendering them less competitive both domestically and internationally. The result would be reduced revenue for both farmers and processors and the loss of jobs for our members.

- Higher operating costs and a less competitive business environment would result in a transfer of oilseed processing and related jobs, including animal production, to other countries and a transfer, not a reduction, in global GHG emissions. In fact, the climate change problem would be exacerbated to the degree that those operations are transferred to countries that use energy sources that are more carbon intensive.

Following are some of the highlights of NOPA's cost analysis (see attached)

- In the near term (2015-2019) NOPA members will spend an estimated **$790 million** on allowances and additional energy costs to operate their plants – that's about **$2.6 million** per plant over that time period in additional annual operating costs.

- In the moderate term (2020-2024) NOPA members will incur an estimated **$1.1 billion** on allowances and additional energy costs to operate their plants – that's about **$3.7 million** per plant in additional annual operating costs.

- In the near-to-moderate term (2015-2024) NOPA members will incur nearly **$1.9 billion** in additional costs.

October 2009

NOPA Estimates of Costs to NOPA Member Companies Associated with Global Climate Change (GCC) Legislation: Costs Due to CO2 Allowances and Increased Energy Prices ($1000s)[a], [b]

YEAR

	2015	2020	2030	2040	2050
CO2 Allowances[c], [d], [e]	90,066	114,629	188,319	302,949	507,644
Natural Gas[c, f]	41,106	54,808	78,787	126,744	184,977
Fuel Oil[c, f]	681	795	1,305	2,100	3,348
Electricity[f]	25,500	51,000	71,400	114,750	155,550
TOTAL	157,353	221,232	339,811	546,543	851,519
$/bushel	0.09	0.13	0.20	0.32	0.50

[a] Subject estimates are based on 1.7×10^9 bushels of soybeans crushed/year from NOPA Statistics (Crush) Reports for NOPA Fiscal Year 2007-2008.

[b] Subject estimates are based on fuel use and electricity utilization estimates for a hypothetical soybean processing plant from a 19 January 2009 NOPA submittal to the United Soybean Board with recommendations on updating of a National Renewable Energy Laboratory (NREL) database for soybean processing (electricity input: 1,500 kWh/1000 bushels of soybeans; heat input: 31 MMBTU/1000 bushels of soybeans, including 65.5% from natural gas/landfill gas, 0.5% from #2 fuel oil, 1% from #6 fuel oil and 33% from coal/biomass).

[c] Fossil fuel heat contents used in the subject estimates (1.01 MMBTU/1,000 CF of natural gas; 18.60 MMBTU/ton of coal; 5.85 MMBTU/bbl of fuel oil) are from a May 2009 "Average Heat Content of Fossil-Fuel Receipts" issued by the U.S. Energy Information Administration.

[d] Emission factors used in estimating greenhouse gas emissions from the burning of fossil fuels (0.0545 kg CO2/CF of natural gas; 2,106.9 kg CO2/metric ton of coal; 426.1 kg of CO2/bbl of #2 fuel oil; 495.4 kg of CO2/bbl of #6 fuel oil) are from USEPA's 2009 GHG "Fast Facts."

[e] Price of CO2 allowances used in estimating costs for 2015, 2020, 2030, 2040 and 2050 ($22, $28, $46, $74 and $124/ton, respectively) are from a May 2009 report by CRA International entitled "Impact on the Economy of the American Clean Energy and Security Act of 2009 (H.R. 2454)."

[f] Increased prices in 2015, 2020, 2030, 2040 and 2050 for natural gas ($1.20/MMBTU, $1.60/MMBTU, $2.30/MMBTU, $3.70/MMBTU and $5.40/MMBTU, respectively), fuel oil ($0.12/gal, $0.14/gal, $0.23/gal, $0.37/gal and $0.59/gal, respectively) and electricity ($0.01/kWh, $0.02/kWh, $0.028/kWh, $0.045/kWh and $0.061/kWh, respectively) used in estimating costs are from a May 2009 report by CRA International entitled "Impact on the Economy of the American Clean Energy and Security Act of 2009 (H.R. 2454)."

December 2, 2009 **ATTACHMENT B**

Representative Tim Holden
Chairman
House Committee on Agriculture,
Subcommittee on Conservation, Credit,
Energy and Research
United States House of Representatives
Washington, DC 20515

Representative Bob Goodlatte
Chairman
House Committee on Agriculture,
Subcommittee on Conservation, Credit,
Energy and Research
United States House of Representatives
Washington, DC 20515

Dear Chairman Holden and Ranking Member Goodlatte:

On July 20, 2009, we sent the attached letter to Senators Boxer and Inhofe, to inform them of the views of our coalition of food, feed, ingredient, beverage, and consumer product processors, manufacturers, distributors, and retailers on prospective climate change legislation. As industries which provide abundant and affordable food and essential consumer goods to all Americans, we felt it necessary to inform you via today's letter of our concerns with climate change policies that could have direct and indirect impacts on the cost of food, feed, and household products.

We have carefully followed the draft legislation released as a chairman's mark by Senator Boxer. We do recognize and appreciate positive steps in certain areas, specifically the ability of a wider array of methane projects to qualify as offset opportunities. We are disappointed, however, that the draft legislation does not adopt any preemption or harmonization provisions, an omission that could result in additional Clean Air Act regulation of sources that already are subject to the emissions cap contemplated in this legislation.

As we have stated before, the facilities represented by this coalition emit roughly two percent of the nation's greenhouse gases (GHGs), but are especially vulnerable to indirect costs. Consumers of the products we produce could be negatively impacted by climate change legislation that significantly increases our energy, transportation, regulatory, and commodity costs. In our view, Congress should take care to avoid adverse impacts on food security, prices, and accessibility.

While we have a number of concerns with the draft legislation, three issues in particular are paramount as the Congress continues to modify the bill:

- **Allowances** – It is critical that any legislation provide allowances to the manufacturers, distributors, and retailers of food, feed, and household products. The distribution of allowances should be based upon an industry's historic emissions, and additional allowances should be

distributed to reflect reductions in emissions between 2000 and 2012. Our industry will be at a significant economic disadvantage to other industries and our competitors around the globe unless the legislation fairly distributes allowances pro rata across all industrial sectors. While food and beverage producers account for 1.21% of the nation's direct GHG emissions (*Carbon Risks and Opportunities in the S&P 500* at 12), if cap and trade legislation is approved, our manufacturers will be more affected by it than this modest figure suggests. All members of the food supply chain are disproportionately vulnerable to indirect costs passed through by suppliers. When considering the total GHG emissions from each sector, including suppliers, the food, feed, and beverage sector has the fourth largest exposure to carbon costs—more than the chemical, retail, basic resources, and automobile and parts sectors. (*Carbon Risks and Opportunities in the S&P 500* at 13).

- **Preemption** – Comprehensive climate change legislation should preempt or, if necessary, harmonize state and regional climate change programs. In addition, comprehensive climate change legislation should explicitly preempt EPA regulation under the Clean Air Act, including EPA's authority to issue New Source Performance Standards for sources that emit between 10,000 and 25,000 tons of CO2e/year and requirements that certain sources be subject to Prevention of Significant Deterioration and Title V permitting. Exposing industry to additional regulation from either EPA or states and regions will yield little additional environmental benefit but could result in significantly higher costs.

- **Offsets –** Our organizations believe a viable offset system is essential to achieve cost containment, as demonstrated by recent EPA and CBO economic analyses. We urge the Committee to work with the food industry and our partners in agriculture and forestry to create an offset scheme that balances the need for affordable offsets with the need for productive land. In particular, we urge the Committee to devise an offset system that limits the retirement of frequently cultivated cropland. Sound climate change legislation should not pit our climate security needs against our food security needs.

We believe these issues will have a profound impact on the international competitiveness of our industry and our ability to provide U.S. consumers with abundant and affordable products. We would be pleased to discuss these or other issues related to climate change legislation with you or your staff in greater detail.

Sincerely,

American Bakers Association
American Feed Industry Association
American Frozen Food Institute
American Meat Institute
Corn Refiners Association
Grocery Manufacturers Association
Institute of Shortening and Edible Oils
International Dairy Foods Association
National Chicken Council
National Council of Farmer Cooperatives
National Grain and Feed Association
National Meat Association

National Renderers Association
National Oilseed Processors Association
National Turkey Federation
North American Millers' Association
Pet Food Institute
Snack Food Association

Senator Barbara Boxer
Chairwoman
Senate Environment and Public Works Committee
United States Senate
Washington, DC 20510

July 20, 2009

Senator James Inhofe
Ranking Member
Senate Environment and Public Works Committee
United States Senate
Washington, DC 20510

Dear Chairwoman Boxer and Ranking Member Inhofe:

As a coalition of food, feed, ingredient, beverage, and consumer product processors, manufacturers, distributors, and retailers, we respectfully provide you with our perspectives as your Committee begins consideration of climate change legislation, and how such legislation may impact providing abundant and affordable food and necessary consumer goods to all Americans. Specifically, as you develop climate legislation, we urge you to consider the direct and indirect impacts on the cost of food, feed, and household products.

Our facilities emit roughly two percent of the nation's greenhouse gases, but we are disproportionately vulnerable to indirect costs. As a result, poorly designed climate legislation could significantly increase the price of food and other household products. In particular, poorly designed climate legislation could significantly increase energy, transportation, regulatory, and commodity costs. These are paramount considerations Congress must consider and prioritize among the issues it addresses. Congress must take extreme care to avoid adverse impacts on food security, prices, safety, and accessibility to necessary consumer products. For this reason, we have joined together to represent the views of this vital segment of our economy as Congress debates this important issue.

If a cap-and-trade approach is taken, we believe that climate legislation should embrace the following principles:

- **Allowances** – The distribution of allowances should be based upon an industry's historic emissions and additional allowances should be distributed to reflect early action reductions in emissions between 2000 and 2012. Although we are an energy-intensive industry, H.R. 2454 fails to provide allowances to the manufacturers, distributors or retailers of food, feed, or household products and fails to provide transition assistance to low-income households struggling with rising food prices. Thus, our industry will be at a significant economic disadvantage to other industries unless the legislation fairly distributes allowances pro rata across all industrial sectors.

- **Threshold** – If a cap is adopted, EPA should not be authorized to lower the threshold for the cap in the future, or use the Clean Air Act to regulate greenhouse gas emissions from sources beneath that threshold. Capturing facilities emitting between 10,000 tons and 25,000 of CO2e/year would more than double the number of facilities subject to regulation, but only increase the share of emissions subject to regulation by one half of one percent, according to EPA.

- **Offsets** – A viable offset system is essential to contain costs. Food processors, farmers, forest landowners, and others should be permitted to generate offsets, including efforts to capture methane either on the farm or through modifications to wastewater systems, to reduce the cost of allowances without unnecessary limitations on the quantity of available offsets. No distinction should be drawn between the use of domestic and international offsets, and no restrictions should be placed on the use of offsets by covered facilities. A well designed offset system should strike a balance between the need for affordable offsets and the need for productive farmland.

- **Preemption** – Comprehensive climate legislation should preempt or, if necessary, harmonize state and regional climate programs. In addition, comprehensive climate legislation should explicitly preempt EPA regulation under the Clean Air Act, including EPA's authority to issue New Source Performance Standards for sources that emit between 10,000 and 25,000 tons of CO2e/year.

- **Trade** – Climate legislation should be contingent on Senate ratification of an international commitment to reduce greenhouse gas emissions that includes all major sources of emissions and should not authorize the Administration to place border measures on goods imported from other nations that do not have equally stringent limits on GHG emissions. In general, climate legislation should be designed to comply with our trade obligations. We should not demonstrate global climate leadership by undermining our commitment to global trade.

In addition, we believe that Congress should carefully consider the cost of allowances between 2020 and 2050, resolve tax treatment questions raised last month by the Joint Committee on Tax, resolve the regulation of any futures or derivatives markets that arise as a result of climate legislation, and make significant financial incentives available for energy efficiency.

As you develop climate legislation, we urge you to carefully consider its impact on the price of food and household products. We believe that H.R. 2454 will increase food and feed prices and reduce the international competitiveness of our businesses, and look forward to working with you to craft climate legislation that reduces greenhouse gas emissions but which also ensures a safe and affordable supply of food.

Sincerely,

American Baking Association
American Feed Industry Association
American Frozen Food Institute
American Meat Institute
Grocery Manufacturers Association
Institute for Shortening and Edible Oils
National Chicken Council
National Council of Farmer Cooperatives
National Grain and Feed Association
National Meat Association
National Oilseed Processors Association
National Turkey Federation
North American Millers' Association
Pet Food Institute
Snack Food Association