AGRICULTURAL LABOR REFORM



Farmers and ranchers urgently need an agricultural labor policy framework that provides a legal, reliable workforce and treats workers with respect. All segments of American agriculture are hindered by critical labor shortages, artificially high costs associated with the H-2A program, and other regulatory barriers to a full and skilled agricultural workforce. Congress and federal agencies should act urgently to reform agricultural labor policies to strengthen food security for families at home and enhance the competitiveness of American agricultural products abroad.

Scan to learn more about NASDA's agricultural labor reform policy.

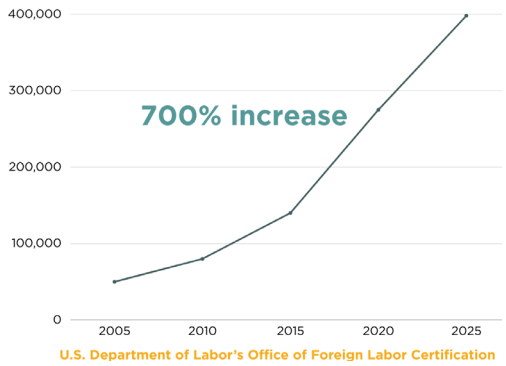
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BACKGROUND

In the latter half of the 20th century mechanization and economic forces led to a 73% reduction in self-employed farm operators and a 51% reduction in hired workers, per USDA's Economic Research Service. The gradual transition from an agrarian society to a highly specialized farm economy means that a skilled, reliable agricultural workforce is essential. Although farmworkers make up less than one percent of all U.S. wage and salary workers, their wages and salaries comprise 12% of all farm costs – a proportion that rises to 40% and 42% for fruit and tree nuts and greenhouses and nurseries, respectively per USDA ERS.

As domestic participation in the agricultural workforce continues to decline, agricultural employers have grown increasingly reliant on foreign-born workers. The H-2A visa program provides a legal avenue for agricultural employers who anticipate a shortage of domestic workers to bring nonimmigrant foreign workers to the U.S. to perform agricultural labor of a temporary or seasonal nature.

H-2A positions requested and approved:



U.S. Department of Labor's Office of Foreign Labor Certification

However, the H-2A program has numerous structural problems that heighten agricultural labor scarcity and imperil U.S. farming and ranching operations across the country. These include, but are not limited to:

- The program restricts participation to seasonal farm labor, excluding most livestock producers who have year-round labor needs
- The Adverse Effect Wage Rate has increased by over 60% in the past decade. These wages do not include the thousands of dollars of application fees, transportation and housing that agricultural employers are required to pay for each H-2A worker.
- Regulatory compliance with the program is increasingly burdensome, andis compounded by requirements to re-submit applications for H-2A workers each year, no matter their standing.

AGRICULTURAL LABOR REFORM



Additionally, according to USDA ERS, roughly 40% of hired crop farmworkers are not legally authorized to work in the U.S. The absence of a clear path for this essential, experienced population to legally participate in the agricultural workforce only exacerbates the current limitations of the H-2A program.

In 2026, economic headwinds threaten the vitality of American farmers and ranchers. While 2025 saw the recission of the Department of Labor's Farmworker Protection Rule and the proposal of an Interim Final Rule that made numerous encouraging changes to the Adverse Effect Wage Rate methodology, Congress and federal agencies still must act urgently this year to achieve overdue reforms to the H-2A program and provide certainty for all segments of the agricultural workforce.

NASDA'S POLICY RECOMMENDATIONS

As Congress considers agricultural labor policy reform, NASDA encourages the following:

- Amending the H-2A and H-2B programs to include year-round workers for all agricultural, livestock and forestry industries
- Respecting and recognizing the importance of our current experienced, but unauthorized, workforce by creating a mechanism for workers in good standing to earn legal status based on agricultural work experience
- A contract visa where employees commit to working for an employer for a fixed period of time when stability is preferred between both parties.

NASDA supports building on the bipartisan, consensus recommendations from the Bipartisan Agricultural Labor Working Group to achieve meaningful policy reforms, as well as the longstanding principles of the Farm Workforce Modernization Act.

NASDA also supports the efforts of the Department of Labor's Office of Immigration Policy, which has endeavored to enhance regulatory efficiency and oversight of the H-2A program. Additionally, NASDA submitted comments on the DOL's Office of Employment and Training Administration Interim Final Rule on H-2A Adverse Effect Wage Rate methodology in December 2025, focusing on:

- Supporting efforts to control unsustainable Adverse Effect Wage Rate growth by creating two distinct skill levels, establishing state-level rates using Bureau of Labor Statistics survey data instead of USDA Farm Labor Survey data, and establishing adverse compensation adjustments to account for non-wage expenses in the program
- Encouraging the U.S. Department of Labor to reconsider the ability of its proposed majority-duties test to effectively mitigate the wage-distorting impacts of disaggregation
- Encouraging continued consultation with state departments of agriculture and other key stakeholders for implementation

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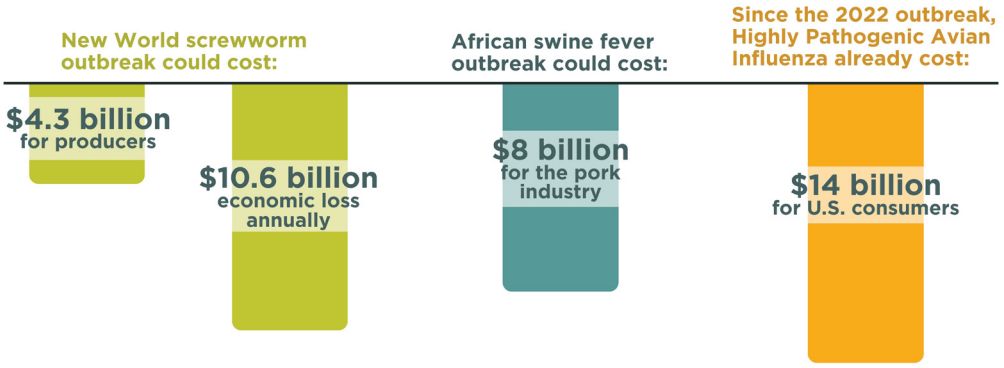
ANIMAL DISEASE PREPAREDNESS AND TRACEABILITY



Any outbreak of a foreign animal disease could cause distress across the entire agricultural sector. Timely identification, control and eradication of animal diseases is essential to U.S. agricultural production, food security, public health, animal welfare and international market access for U.S. producers. NASDA is committed to working with intergovernmental agencies and industry stakeholders to foster a collaborative approach to animal health initiatives.

State departments of agriculture, along with other federal and state partners, are responsible for tracking, responding and containing outbreaks of animal diseases in their states to protect the livestock industry, and more broadly, the U.S. food supply.

We must prepare now to avoid the next outbreak. NASDA's policy positions advocate for establishing strong animal health programs that could save billions of dollars of losses in the future from economically devastating diseases.



NASDA'S POLICY RECOMMENDATIONS

NASDA supports fully funding these critical programs:

- National Animal Vaccine and Veterinary Countermeasures Bank
- National Animal Disease Preparedness and Response Program
- National Animal Health Laboratory Network

NASDA requests additional programs to be established that:

- Maintain and strengthen funding mechanisms that enable states to execute disease surveillance, testing and response activities.
- Enhance investment in research needed to advance diagnostics, vaccines and other response or treatment options to current or emerging animal diseases and programs for outreach, education and implementation of science-based biosecurity protocols.
- Recognize the importance of agriculture's voice at both the federal and state levels in a One Health approach of collaborating to accomplish the goal of safeguarding animal, public and environmental health comprehensively.

Scan to learn more about NASDA's policy.

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ANIMAL DISEASE PREPAREDNESS AND TRACEABILITY



NASDA Supported Legislation:

- Foreign Animal Disease Prevention, Surveillance and Rapid Response Act (H.R.3915) - Funds the three-tiered approach to combating foreign animal diseases
- Healthy Dog Importation Act (H.R. 3349 & S. 1725) - Increases oversight at the borders to prevent disease introduction by domesticated dogs, a key carrier of diseases like New World screwworm
- Rural Veterinary Workforce Act (H.R. 2398 and S. 1163) - Allows veterinarians practicing in rural areas to be exempt from student loan repayments, thereby incentivizing these critical practitioners to stay in rural practices

BACKGROUND

State departments of agriculture recognize the importance of cross-agency collaboration to accomplish the goal of safeguarding animal, public and environmental health comprehensively. In combating Highly Pathogenic Avian Influenza, state departments of agriculture have worked collaboratively with both their state and federal counterparts to minimize the spread of the highly infectious disease.

The ability to rapidly identify and locate at-risk livestock is essential to limiting outbreak size, reducing the impact of depopulation, and restoring market access, making traceability an essential preparedness tool. One of the most successful and collaborative traceability tools to date is the National Milk Testing Strategy, which has greatly increased the prevention and traceability of HPAI outbreaks and while not perfect, has been shown as an effective tool in combating HPAI.

The 2018 Farm Bill established a three-tiered program to support the development and timely deployment of all measures necessary to prevent, identify and mitigate the potentially catastrophic impacts of an animal disease outbreak. To protect producers, consumers and the broader food supply chain, these risks must be met with fully funded preparedness and response programs, robust traceability capabilities and the ability for state animal health officials to act quickly during an incident.

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FARM BILL



The next Farm Bill must remain unified, securing a commitment to American agriculture and to vital food and nutrition assistance programs for those who need them most.

NASDA's farm bill priorities include:

- Agricultural research
- Animal disease
- Biotechnology
- Conservation
- Cyber security
- Energy
- Food safety
- Mental health
- Pesticide regulations
- Regional food systems and nutrition programs
- Specialty crop block grant
- Trade promotion

Scan to learn more about NASDA's farm bill policy.

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NASDA'S FARM BILL RECOMMENDATIONS:

AGRICULTURAL RESEARCH

- Increase funding for the USDA Agricultural Research Service and the National Institute of Food and Agriculture.

ANIMAL DISEASE

- Support the three-tiered animal disease prevention and management method established by the 2018 Farm Bill.
- Provide adequate funding for the National Animal Vaccine and Veterinary Countermeasures Bank to support the livestock industry.
- Develop an early disease detection warning system for coordination between intergovernmental agencies and industry in preparing and responding to new disease outbreaks.
- Reauthorize the Veterinary Medical Loan Repayment Program, which is critical for recruiting and retaining rural veterinarians.
- Increase health and safety monitoring for imported domesticated dogs, Healthy Dog Importation Act (H.R. 3349 & S. 1725).

BIOTECHNOLOGY

- Support the establishment of an office of biotechnology policy or similar efforts that would streamline the regulation and adoption of biotechnology products.

CONSERVATION

- Expand conservation practices by establishing a new USDA Natural Resources Conservation Service state block-grant program to help state agriculture departments improve soil health and water quality on agricultural lands.

CYBER SECURITY

- Maintain the Comprehensive Food Safety Training Network at the authorized level of $20 million per year.

ENERGY

- Support continued, modernized investment in the agricultural bioeconomy.
  - The Agricultural Biorefinery Innovation and Opportunity Act (H.R. 3253 & S. 2467)
  - The Biomanufacturing and Jobs Act (H.R. 4832 & S. 2654)

FOOD SAFETY

- Provide resources to assist farmers in complying with the Food Safety Modernization Act, which shifted American food safety regulation toward preventive and farm-focused measures.

MENTAL HEALTH

- Support continued, expanded investment in state-facilitated mental health resources for farmers and ranchers through the Farm & Ranch Stress Assistance Network, The Farmers First Act of 2025 (H.R. 4400 & S. 2282).

FARM BILL



PESTICIDE REGULATIONS

- Bolster consistent, uniform, science-based labeling of pesticide products by clarifying that neither the EPA nor the states can adopt pesticide labels that contain human health claims that are inconsistent with EPA findings. Pursue this clarification in a manner affirming states have full rights to otherwise regulate pesticides under Section 24 of the Federal Insecticide, Fungicide and Rodenticide Act and that state pesticide regulations preempt local regulations.
- Support efforts to improve EPA's coordination regarding risk mitigation measures in a manner that incorporates input from USDA and grower organizations.
- Include USDA Office of Pest Management Policy in Federal Insecticide, Fungicide and Rodenticide Act Interagency Working Group activities.

REGIONAL FOOD SYSTEMS & NUTRITION PROGRAMS

- Invest in regional food system infrastructure, equipment & coordination support.
- Prevent food waste & farm loss by streamlining critical supply chain support.
- Strengthen public health outcomes through dietary guidance and nutrition education programs.
- Increase investments in food assistance and nutrition incentive programs that bolster regional food systems and focus on health-driven outcomes such as:
  - Expanding the Gus Schumacher Nutrition Incentive Program and Produce Prescription Programs to increase the number of farmers markets and other authorized retailers who accept SNAP benefits
  - Increasing funding for WIC and Senior Farmers' Market Nutrition Programs
  - Increasing the USDA Farm to School Grant Program, which enhances access to local foods in schools while fostering hands-on food and nutrition education
  - Establishing permanent and flexible state-led food purchasing models, and increase administrative support at the state-level for existing programs, Local Farmers Feeding Our Communities Act (H.R. 4782) and the Strengthening Local Food Security Act (S. 2338).
- Implement comprehensive updates to the National School Lunch and Breakfast Programs to support local agriculture, increase the quality of food offered and make meals more affordable and available, such as:
  - Adjusting reimbursement rates to better reflect current bulk food prices
  - Streamline administrative requirements for schools and school districts
  - Assisting districts with the costs of preparing and storage of food
  - Encouraging schools to purchase foods from in-state or geographically proximate sources by easing procurement regulations
  - Eliminating the need for waiver requests for state departments of agriculture to operate and manage school meal programs, recognizing their strong expertise and proven track record in food safety, production, marketing and grant management
  - Integrating comprehensive dietary education alongside programs that promote increased physical activity for students

SPECIALTY CROP BLOCK GRANT

- Ensure the program remains locally responsive and allows states the flexibility to work closely with specialty crop farmers and grower groups in establishing annual priorities.

TRADE PROMOTION

- Combine the "Supplemental Agricultural Trade Promotion Program" with the Market Access Program and Foreign Market Development Program. Combining the programs would increase efficiency by eliminating the need to administer two similar programs.

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PESTICIDE REGULATIONS



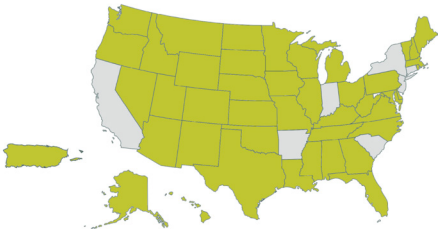
A predictable, enforceable, science-and-risk-based pesticide regulatory framework is essential for maintaining agricultural productivity while minimizing adverse impacts on human health, the environment and endangered species. State primacy for pesticide regulatory enforcement is a cornerstone of that framework. NASDA encourages Congress and EPA to provide adequate resources to state lead agencies and strive to meaningfully implement their feedback on pesticide policy initiatives, particularly related to the enforcement of Endangered Species Act mitigation measures on pesticide labels.

Scan to learn more about NASDA's pesticide regulations policy.

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BACKGROUND

State Agriculture Departments' Role in Pesticide Regulations



In 43 states and Puerto Rico, the state department of agriculture is a co-regulatory partner with EPA and is responsible for administering, implementing and enforcing the production, labeling, distribution, sale, use and disposal of pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act.

In addition to state-level registrations of pesticides, some key pesticide regulatory implementation activities led by states include:

1. Producer Establishment & Marketplace Inspections: States inspect sites where pesticides are produced, distributed and sold to ensure that the products purchased by users are properly registered and labeled.
2. Applicator Certification and Education: States work with pesticide safety educators to ensure applicators are trained and certified to use pesticides in accordance with the label.
3. Compliance Enforcement: State inspectors conduct both routine and for-cause investigations to ensure pesticides are used according to the label. This is key to protecting applicators, workers and the public, as well as preventing adverse effects on the environment.

Endangered Species Act Workplan

Under the Federal Insecticide, Fungicide, and Rodenticide Act , the EPA is required to assess a wide variety of potential human health and environmental effects when considering a pesticide product for registration or re-registration, including impacts on species or critical habitats identified by the U.S. Fish and Wildlife Service.

Following years of legal challenges to these efforts, the EPA published its Endangered Species Act Workplan, a systematic approach to bring future pesticide registrations into

PESTICIDE REGULATIONS



compliance with the act. To date, under the workplan, EPA has published a final Herbicide Strategy and final Insecticide Strategy. A draft Fungicide Strategy is expected in 2026, and a final Rodenticide Biological Evaluation and final Vulnerable Species Pilot Project have also been published.

NASDA commends EPA on its significant efforts to refine its original draft Herbicide and Insecticide Strategies into final strategies that offer more flexible measures for growers and pesticide applicators to mitigate the impacts of pesticide runoff and drift on endangered species and critical habitats. As these more flexible mitigation measures are being applied to new pesticide labels, however, state lead agencies need additional clarity on how to standardize certain inspection and documentation processes.

NASDA'S POLICY RECOMMENDATIONS

NASDA urges EPA to continue to engage in robust dialogue with state lead agencies to incorporate feedback about the enforceability of key mitigation measures. 2026 will be a critical year for on-the-ground implementation of the Endangered Species Act Workplan. The states' abilities to meaningfully enforce these new provisions are instrumental for minimizing adverse impacts on human health, the environment, endangered species and critical habitats.

NASDA has outlined some of its specific priorities for pesticide regulations in the following public comments and letters submitted in 2025:

- Comments on the Updated Mitigation Proposal for the Atrazine Interim Registration Review Decision
- Comments on Varroa Mite Pesticide
- Letter on Priorities for FY26 to House Appropriations Subcommittee on the Interior, Environment, and Related Agencies
- Comments on EPA's Proposed Registrations of Over-the-Top Dicamba Products

Key NASDA Positions on Federal Insecticide, Fungicide, and Rodenticide Act Implementation

- NASDA supports the science-based and comprehensive regulatory framework FIFRA provides to pesticide-related environmental and public health protection.
- NASDA supports state primacy in the enforcement of pesticide activities under FIFRA.
- EPA must recognize states are not stakeholders but are co-regulatory partners under FIFRA and, therefore, must be consulted on any FIFRA regulatory or policy initiatives.
- NASDA calls for appropriate and sustained funding for state lead agencies as co-regulatory partners with EPA under FIFRA.

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REGIONAL FOOD PROCUREMENT & DISTRIBUTION



NASDA supports an immediate increase in federal policies and investments that strengthen regional food systems through resilient infrastructure, flexible state-led food purchasing programs, and expanded institutional procurement of local and regional foods. Federal partnership with states is also essential to the success of any newly established programs as state agriculture departments serve at the nexus of all elements of the supply chain, from the farm to food processors to organizations that purchase food to serve local communities.

Scan to learn more about NASDA's regional food procurement and distribution Policy.

NASDA

ISSUE:

Small- and medium-sized farmers, especially specialty crop producers, are eager to supply a variety of nutrient-dense foods to local and regional markets. However, gaps in federal support for food system infrastructure and supply chain resilience continue to limit their ability to reach dependable markets. At the same time, schools, hospitals, food banks and other institutions want to procure more local foods but lack reliable regional supply chains to do so at scale.

Strategic federal investments—paired with state-led implementation—can convert appropriated dollars directly into food purchases from American farmers while building the infrastructure needed to sustain those markets long term. Without targeted action, the nation risks declining farm viability, lost rural economic opportunity and weaker public health outcomes.

NASDA RECOMMENDATIONS:

Expand and Codify Funding for the Resilient Food Systems Infrastructure Program

- The federal Resilient Food Systems Infrastructure Program expanded domestic market opportunities for small- and medium-sized farms and agri-businesses by strengthening the middle of the supply chain.
- This one-time investment provided competitive subawards for critical equipment and food systems infrastructure, helping farmers access new markets and supporting the stability and resilience of regional food systems.
- Future federal funding should prioritize investments in transportation, aggregation, cold storage and processing to close gaps between farm production and distribution, ensuring farmers can reliably reach regional markets.

Establish and Codify Funding for Cooperative Agreements with State Departments of Agriculture for Local & Regional Food Purchases

- NASDA supports permanent funding for flexible, state-led food purchasing programs to bridge local and regional farmers with new market access, address regional nutritional insecurity and hunger, and advance national public health outcomes.

REGIONAL FOOD PROCUREMENT & DISTRIBUTION



- NASDA supports cooperative agreements, in partnership with state departments of agriculture, as a flexible and proven tool to link regional supply with regional demand.
- State agriculture departments are well-positioned to coordinate with federal, state and local partners to meet regional needs for farmers, producers, hunger relief, school meals, emergency feeding and Food is Medicine initiatives.
- These programs create new market opportunities, help keep farmers on the land, strengthen supply chains, diversify market access, reinforce economic links, and reduce food waste and crop loss. Previous models have shown direct, meaningful new opportunities for small- and medium-sized farms and specialty crop producers to meet regional institutional demand.
- NASDA supports re-establishing these programs, increasing funding and expanding avenues and innovation for regional procurement and distribution opportunities including institutions, emergency feeding and new healthcare initiatives. NASDA supports including administrative funding in federal agreements to ensure effective state implementation.
- NASDA supports H.R. 4782, the Local Farmers Feeding Our Communities Act and S. 2338, the Strengthening Local Food Security Act.

Expand Procurement Opportunities Across Federal Programs

- NASDA urges federal agencies and Congress to use the above policy recommendations as tangible, cost-effective mechanisms to leverage and integrate more local and regional foods into public health initiatives and hunger relief programs including:
  - School meals and child nutrition programs
  - Emergency feeding and hunger relief
  - “Food is Medicine” and healthcare programs
  - Institutional feeding (i.e. military, prisons, Department of Defense, Veterans Affairs)
  - New federal initiatives (i.e. MAHA Boxes for SNAP)

Establish Funding & Strengthen Coordination Between Federal Programs & Regional Food Systems

- A dedicated link between federal programs and regional food systems is needed to improve efficiency and strengthen supply chain resilience, alongside state departments of agriculture.
  - Key functions should include:
    - Streamlining access to federal programs, grants and technical support
    - Aggregating resources for first-mile supply chain needs, including transportation, aggregation, cold storage and processing
    - Training and guidance to regional food enterprises and agri-businesses to enhance capacity and ensure food safety
    - Aligning initiatives across USDA, U.S. Department of Health and Human Services, U.S. Food and Drug Administration and other federal agencies to reduce duplication and boost impact

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