



**CRA**  
CORN REFINERS  
ASSOCIATION

## CRA Update June 2, 2020

### COVID-19

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#### COVID-19 Industry Response

Staff continues to work closely with food and agriculture industry allies regarding COVID-19 matters. Notably, CRA has been leading discussions with allied food associations on clarifying workplace safety protections. Recently, CRA led development of a letter to Vice President Pence encouraging his assistance in coordination between federal agencies to provide clarity in workplace safety guidance based on the best available virus science. Additionally, staff continues to support industry efforts to prioritize the food and agriculture sector for necessary supplies to both protect workers and continue operations. Staff also continues to participate on frequent calls with the Administration and various federal agencies. CRA staff continues to monitor the COVID-19 crisis and provide daily updates to several CRA committees regarding government updates and guidance, as well as industry activities.

**Contact:** [Allison Cooke](#)

### ENVIRONMENTAL AFFAIRS

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#### Biogenic CO2 Rulemaking

On May 20, during a Senate Environment and Public Works Committee hearing, Senator Mike Braun (IN) referenced a letter signed by 21 leading climate scientists when asking EPA Administrator Wheeler if the Agency had a plan for addressing biogenic CO2 emissions from annual crops. In response, Wheeler referred to a "three-phase plan" that will result in a rule within 12-18 months. In response to these comments, CRA produced a short video with context on the issue and footage of the hearing, which was promoted with a press release and on social media. Unfortunately, EPA has been offering the 12-18 month timeline for years, and the Biogenic CO2 Coalition will continue its efforts to get a commitment from EPA on the issue this year. In the meantime, the Coalition has welcomed the National Grain and Feed Association (NGFA) to its ranks. NGFA represents over 1,050 companies with 7,500 facilities that handle more than 70% of all the US grains and oilseeds in domestic and export markets. NGFA's participation further strengthens the Coalition's voice and demonstrates the breadth of industries affected by this policy. In addition, CRA's grassroots campaign to drive emails to Congress from constituents has now resulted in more than 12,000 emails to 82 Senators and 187 House members.

**New Video:** [Biogenic CO2 Coalition Calls On EPA To Fight For Rural America](#)

**Coalition Press Release:** [Biogenic CO2 Coalition Urges EPA to Reconsider Year-Long Delay in Helping American Agriculture](#)

**Inside EPA:** [Farm Groups Surprised By Wheeler's Biomass Permitting Plan](#)

**Biomass Magazine:** [Biogenic CO2 Coalition asks EPA to reconsider delay in rulemaking](#)

**Ethanol Producer Magazine:** [Biogenic CO2 Coalition asks EPA to reconsider delay in rulemaking](#)

**Contact:** [Eamon Monahan & Thomas Parks](#)

### FOOD & NUTRITION

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#### Update on Mexico FOP Law

In March, the Mexican government issued a new front-of-pack (FOP) labeling law with a compliance date of October 1, 2020. Since then, CRA has worked closely with industry partners, mainly through the National Association of Manufacturers (NAM), to address the law, which would mandate stop sign warning FOP labels on products that exceed certain nutrient thresholds (e.g., calories, sugar, fat, sodium). CRA has been involved with industry outreach to U.S. officials to raise concerns about the law, particularly the short implementation period and the new definition for dietary fiber, which was not included in the proposal for public comment and would no longer be harmonized with the U.S. definition for dietary fiber. In a recent virtual meeting of the World Trade Organization (WTO) Technical Barriers to Trade (TBT) Committee, the U.S. encouraged Mexico to extend the law's implementation period by one year, and it raised concerns regarding the new dietary fiber definition and the Mexican government's failure to provide prior notice of this revision. These points were also raised in a bilateral meeting with officials from Mexico's Ministry of Economy. At this stage, Mexico has indicated they do not plan to extend the implementation period or open a comment period on the revised dietary fiber definition. Staff is working through NAM to encourage secretarial-level discussions between the U.S. and Mexico to address these issues.

**Contact:** [Allison Cooke](#)

### ADVANCED BIOPRODUCTS & PLANT BASED PRODUCTS COUNCIL

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#### PBPC Comments on California Food Packaging Regulations

On May 21, the Plant Based Products Council (PBPC) submitted comments on regulations proposed by CalRecycle pursuant to the Sustainable Packaging for the State of California Act of 2018 (SB 1335). The law requires food service providers at state-owned facilities to use food service packaging that is reusable, recyclable, or compostable. CalRecycle must adopt regulations by January 1, 2021 that specify criteria and a process for determining the types of food service packaging that are reusable, recyclable, or compostable.

PBPC comments focused on concerns regarding the proposed criteria for compostable items, which include requirements for the food service packaging material to be regularly collected for composting by at least 75 percent of organics recycling programs and items to be composted by at least 75 percent of compost facilities permitted to accept mixed materials. For a multitude of reasons, many compost facilities will not accept compostable packaging today, meaning no "compostable" product would meet the proposed criteria. PBPC recommended adopting a more nuanced approach that would allow the use of compostable products when, where, and as these products' challenges are resolved and haulers and composting facilities are willing to accept them.

#### PBPC Leads Formation of U.S. Composting Infrastructure Coalition

In partnership with the U.S. Composting Council (USCC), PBPC is leading the formation of the U.S. Composting Infrastructure Coalition. This new coalition is being developed to represent a substantial cross section of the U.S. organic waste management community, along with other stakeholders supporting innovative and responsible municipal waste management solutions. The Coalition's members will work together to advocate for policies, legislation, and other measures that support the methodical expansion of all facets of composting infrastructure throughout the country. Infrastructure development facilitates the adoption of compostable biobased materials. Current members of the Coalition include: Plant Based Products Council, U.S. Composting Council, Biodegradable Products Institute, Institute for Local Self Reliance, and Californians Against Waste, and several additional organizations have expressed interest in joining. The Coalition will host its first meeting soon to begin building out a policy advocacy agenda.

**Contact:** [Jessica Bowman](#)

### SUSTAINABILITY

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#### Good News for the Future of the Monarch Conservation Database

On April 13, CRA, as a member of the Keystone Policy Center Monarch Collaborative, signed on to a letter from the Collaborative to the U.S. Fish and Wildlife Service (FWS), urging FWS to continue maintaining the online Monarch Conservation Database (MCD) which was scheduled to be discontinued later this year. After a month of waiting, the Monarch Collaborative received encouraging pre-announcement news directly from FWS. FWS has decided to keep the MCD operational past its planned expiration date, enhancing this service and ensuring that the MCD preserves its utility as the central repository for information regarding all planned and active monarch conservation efforts. As CRA members consider monarch conservation projects on facilities and rights-of-way, the continued operation of this database will be critical to planning efforts, as well as providing the public with a means to verify and appreciate the forward-leaning sustainability efforts of CRA member companies.

Please note: The news of the MCD's continuation was given to the Monarch Collaborative in confidence from FWS before its public announcement later this year. As such, we ask that this news remain among member companies for the time being.

**Contact:** [Justin Maroccia](#)

### TRADE

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#### CRA leads Agriculture Coalition Letter to Secretary Pompeo

Recently, CRA worked with colleagues at the National Milk Producers Federation to coordinate a letter from more than 30 food and agriculture associations asking Secretary of State Mike Pompeo and other senior officials at the U.S. Department of Agriculture (USDA), Office of the United States Trade Representative (USTR), and Department of Commerce last month to fund and support the Inter-American Institute for Cooperation on Agriculture (IICA). In this present environment, where funding and support for international institutions is under scrutiny, the letter serves to ensure timely support for IICA. As noted in the letter, "Increasingly, U.S. competitors seek to use trade agreements and international standards to advance national or regional interests and erect de facto prohibitions on importation of U.S. products." The letter further highlights several important collaborations between IICA and USDA to enhance market access for U.S. food and agriculture products.

[Letter to Secretary Pompeo](#)  
[Inter-American Institute for Cooperation on Agriculture: Who Are We?](#)

**World-Grain:** [Ag groups press for release of funds in support of IICA](#)

**Contact:** [Michael Anderson](#)