

Executive Order 13781, "Comprehensive Plan for Reorganizing the Executive Branch"  
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The following comments are submitted in response to the Department's request for comments regarding aspects of the Secretary's proposed reorganization plan.

On behalf of the National Milk Producers Federation (NMPF), which serves as the voice of America's dairy farmers, and the dairy cooperatives they own, we strongly support the proposed move of the U.S. Codex Office (the Codex office) from the Food Safety Inspection Service to the new Trade and Foreign Agriculture Affairs office (TFAA). NMPF also offers its comments on the proposed merger of the Center for Nutrition Policy and Promotion (CNPP) into the Food and Nutrition Service (FNS).

The Codex office plays a critical role in formulating international, science-based food safety standards to be adopted by the Codex Alimentarius Commission (CAC). These standards ensure greater transparency and safer food worldwide in the interest of consumers, producers and manufacturers. As the U.S. dairy industry's reliance on exports continues to increase, the need for a proactive, engaged and fully-resourced Codex office to engage on the dairy industry's behalf is only more critical. NMPF believes the proposed reorganization, which relocates the the Codex office within the TFAA will enhance efficiencies and provide the office with the support, resources and opportunity for increased coordination that the office hasn't had previously.

The agriculture industry has repeatedly advocated for science and maintains that sound science must remain the foundation of all Codex standards. As such, NMPF does not believe that the relocation of the Codex Office will have any impact on the promotion and furtherance of sound science. To the contrary, the proposed reorganization will only serve to elevate the status of the scientific and technical staff that work on the development of international food safety standards by providing them with additional resources, insights and support. It is further our firm belief that this move will foster greater communication and collaboration amongst several of the U.S. agencies that work to create and promote increased trade of U.S. agriculture products. The Codex office is already structured to work in close collaboration with other agencies, and this reorganization will further aid those existing collaborative efforts. NMPF strongly believes that all U.S. policymakers, agencies and their staffs should consult the Codex office on matters related to international food safety standards and that this reorganization will further that goal.

The Codex office must be seen by our international partners as an integral part of our trade policy decision making process. Codex standards are frequently referenced and utilized during negotiations for free trade agreements, and upheld by the World Trade Organizations and other international bodies. By elevating the office to report to the newly-created Office of the Under Secretary of Trade, NMPF believes that the Codex office will be better equipped to defend the principles of sound science and protect U.S. interests abroad. Working directly with the Under Secretary signifies to our trading partners that the importance and relevance of the Codex office have only increased. It will further demonstrate

to our international partners that food safety and scientific standards remain both the Codex office and TFAA's primary concern.

The proposed reorganization of the Codex office is not meant to compromise science for trade. In fact, the United States and industry need science-based decisions from organizations like the Codex Alimentarius Commission now more than ever. Codex standards level the playing field internationally and ensure consistent, uniform adherence to scientific standards. Promoting the Codex office under TFAA will also help industry and others who work outside USDA on Codex issues, allowing for a stronger, more unified position that takes into account varied perspectives and expertise. NMPF will work to maintain its involvement on all Codex technical committees and continue to encourage the collaboration between the Codex office and other agencies in furtherance of science-based food safety standards and fair and safe agriculture trade.

Another important element of the proposed USDA reorganization is the plan that contemplates merging the Center for Nutrition Policy and Promotion (CNPP) into the Food and Nutrition Service (FNS), with the CNPP executive director position being replaced by an associate administrator position within FNS. We feel it is important to raise the following points for consideration:

First, it is vital that this reorganization focuses on enhancing, and in no way diminishing, USDA's critical responsibilities in preparing the Dietary Guidelines for Americans (DGA). CNPP has been the department's lead agency for the DGA. In our view, it is necessary for USDA to retain its joint leadership role in the DGA process. Indeed, USDA is scheduled to be in charge of the upcoming 2020 revisions. With all due respect to the Department of Health and Human Services, we firmly believe that it is important for the Department of Agriculture, with its unique and comprehensive expertise in food production and nutrition, to remain in a leadership role. In that regard, a re-statement of USDA's mission to co-develop the DGA would be appropriate in the context of the planned reorganization.

It is also vital that the existing expertise and resources within CNPP be fully utilized in preparing to revise the DGA. CNPP, even if now part of FNS, should remain the intra-departmental lead in the DGA process. Other agencies, such as the Agricultural Research Service, have critical scientific expertise that should be frequently consulted, but nutrition policy, promotion and leadership roles should remain within the framework of what is now CNPP. Toward that end, we recommend that in the submission of budgets, the categorization of personnel and the development of appropriation requests, the resources available to CNPP should be transparently and publicly provided. We also believe it is imperative for these resources to be adequate for CNPP's tasks, including a needed update by CNPP on new and emerging research on the role of milkfat in the diet, and new responsibilities such as the development of dietary guidelines for pregnant women and children from birth to 24 months of age.

We strongly urge USDA to recognize the critical importance of the DGA, including both the process for developing and revising this guidance, and efforts to disseminate the DGA to both professional and public audiences. It is important that the planned reorganization not diminish the department's efforts to make the DGA the very best reflection of current and evolving nutrition science.

We urge USDA to consider these points as it further contemplates both the relocation of the Codex office within the TFAA and the merger of the Center for Nutrition Policy and Promotion (CNPP) into the Food and Nutrition Service (FNS).

