August 4, 2025

The Honorable Robert F. Kennedy, Jr.
Secretary, U.S. Department of Health and Human Services
Chair, Make America Healthy Again Commission
200 Independence Avenue, S.W.
Washington, DC 20201

Submitted via email to: Heidi Overton, MD, PhD. Deputy Assistant to the President for Domestic Policy

Dear Secretary Kennedy,

The National Corn Growers Association (NCGA) appreciates the opportunity to provide recommendations that the Make America Healthy Again (MAHA) Commission should consider as it develops the upcoming MAHA Policy Recommendation Report due August 12.

Founded in 1957, NCGA represents more than 36,000 dues-paying corn growers in 48 states and the interests of more than 500,000 farmers who contribute through corn checkoff programs in their states. NCGA and its affiliated associations in 27 states work together to help protect and advance corn growers' interests.

NCGA shares the Commission's goal of striving for a healthy America and focusing on key factors affecting childhood health. The MAHA Make Our Children Healthy Again Assessment aspired for the agencies to work with farmers to ensure that U.S. food is the healthiest, most abundant, and most affordable in the world. This aspiration should be realized quickly, as the U.S. food supply is already healthy, abundant, and affordable, with farmers taking great pride in their work to provide food, feed, fuel, and fiber for this great nation.

Corn is one of the most versatile grains consumed worldwide, known for its numerous health benefits, whether consumed fresh or processed into cereal, starch, cornmeal, or oil.[1] All forms of corn contain B vitamins and essential minerals, including iron, copper, manganese, zinc, and magnesium. Corn is a significant source of insoluble fiber, making it a low-glycemic index food that is digested slowly and does not cause sudden spikes in blood sugar. Corn syrup is nearly identical to table sugar and is nutritionally

[1] https://www.mayoclinichealthsystem.org/hometown-health/speaking-of-health/corn-a-versatile-nutrition-choice. Corn: A versatile, nutrition choice - Mayo Clinic Health System. Accessed 7/21/25.

NATIONAL CORN GROWERS ASSOCIATION

equivalent, containing the same number of calories as sugar and honey.[2] Each form of sugar has benefits that lend to its use in specific products. Corn syrup enhances the flavors of fruit and spices, keeps food fresh, and improves the texture of high-fiber products. The chicken, beef and pork that are the protein mainstays of the American diet are also reliant on corn. Corn is an integral part of livestock feed because it is inexpensive and a readily available source of energy and protein.[3] Furthermore, corn and its byproducts are used in numerous household products, ranging from surgical dressings to soap and toothpaste; all items that support the health of Americans.[4]

To make policy recommendations, we must first address how farmers produce increasing quantities of high-quality corn on the same amount of land to meet the demands of growing populations. Farmers rely on tools and technologies like fertilizers, biotechnology and hybrid seeds, farming equipment, and pesticides to help control some of the many variables that make growing a high-yielding crop uniquely challenging. Pesticides are a vital component of all types of agricultural production systems (conventional and organic), and without these tools, yields would be compromised. For instance, corn yields could be reduced by up to 70%[5] without pesticides to ward off weeds, above and below ground pests, and humidity-loving fungi. Losses of this magnitude would impact food availability and grocery prices, ultimately harming the health of Americans.

The importance of soil health cannot be underestimated for successful crop production. Healthy and abundant food systems rely on healthy soil. The key question is what defines healthy soil? Healthy soil is rich in nutrients, maximizes water infiltration, limits erosion, and sequesters carbon efficiently. Healthy soil is typically attributed to agronomic practices and techniques that enhance nutrient processing and availability, improve soil structure, increase organic matter content, and stimulate biological activity. Best management practices that build soil health and sustain productivity are implemented on a regional and site-specific basis; therefore, it is unrealistic for preconceived notions or one-size-fits-all prescriptions to dictate how farmers achieve healthy soils.

Some believe reducing dependency on synthetic inputs is the only way to achieve healthy soils. Many farms that utilize herbicides could easily demonstrate they have very healthy soils. A 2016 meta-analysis study found that glyphosate (a common herbicide), when used at field-applicable rates, had no significant

---

[2] https://corn.org/about-cra/hfcs-faq/. High Fructose Corn Syrup FAQ | Corn Refiners Association. Accessed 7/21/25.

[3] https://nebraskacorn.gov/cornstalk/why-farmers-feed-corn-to-their-cattle-pigs-and-chicken/. Why Farmers Feed Corn to Their Cattle, Pigs and Chickens. Accessed 7/22/25.

[4] https://nebraskacorn.gov/wp-content/uploads/2010/07/unit9_TeachersKey.pdf. Products of Corn. Accessed 7/22/25.

[5] https://ncga.com/stay-informed/media/the-corn-economy/article/2025/05/the-economic-benefits-of-pesticides-to-farmers-and-society. The Economic Benefits of Pesticides to Farmers & Society. Accessed 7/21/25.

effects on the living microorganisms in the soil (soil microbe biomass) or the ability of those microbes to decompose organic matter (soil microbe respiration).[6] Soil microbe biomass and respiration both serve as key indicators of healthy soil. Herbicides are foundational to the adoption and long-term use of conservation tillage and cover cropping practices, which are critical for reducing soil erosion, improving water quality, enhancing soil health, and supporting productive farmland.[7]

Corn farmers read and follow pesticide label directions for multiple reasons. First and foremost, the label, which relays information on how to apply the product safely, is a legal document for which violation is a federal offense.[8] Proper use of pesticides not only protects humans and the environment from potential exposures but also protects farm economics by preventing waste and unintended crop damage. In fact, by following label directions, farmers have been able to dramatically reduce the amount of herbicides used per acre over the past 20 years. In 2021, farmers used an average of 0.7 pounds of herbicide per acre, less than half the 1.7 pounds used in 1990.[9]

U.S. corn farmers are committed to continuous improvement in the production of corn, a versatile crop providing abundant high-quality food, feed, renewable energy, biobased products, and ecosystem services. As stewards of the land, we recognize our responsibility to create a more environmentally and economically sustainable world for future generations, achieved through transparency and continued advances and efficiencies in land, water, and energy use.

Based on the issues raised in the MAHA Commission's Initial Assessment, released on May 22, we offer the following recommendations.

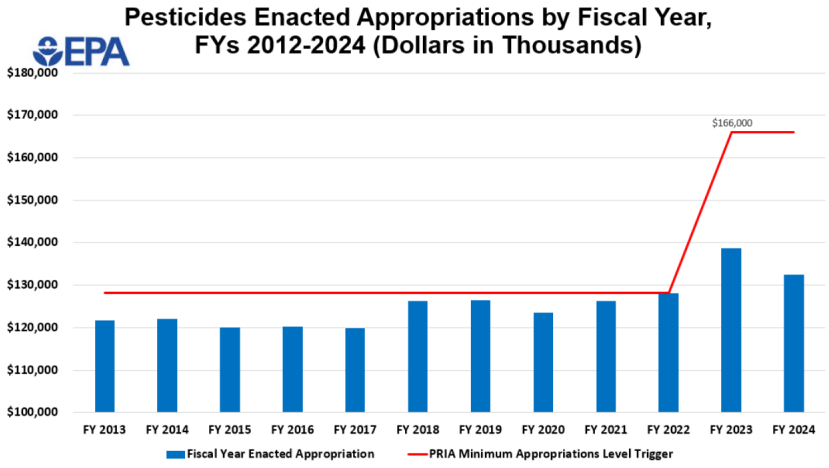
EPA's Risk and Science-Based Review System and Innovation Recommendations

**NCGA recommends that the MAHA Policy Recommendation Report reinforce the robust, globally respected pesticide review process used by the Environmental Protection Agency (EPA)**. EPA's risk-benefit approach upholds the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), ensuring that each pesticide sold in the United States has been approved based on extensive scientific data. These well-documented risk assessment processes, developed over decades, include internal cross-disciplinary peer

[6] https://doi.org/10.1016/j.soilbio.2015.09.014. Impact of glyphosate on soil microbial biomass and respiration: A meta-analysis - ScienceDirect. Published January 2016. Accessed 7/30/25.
[7] https://www.tandfonline.com/doi/epdf/10.4161/gmcr.1.1.9404?needAccess=true. Effects of glyphosate-resistant crop cultivation on soil and water quality. Published January 2010. Accessed 7/30/25.
[8] https://www.epa.gov/pesticide-labels/ways-obtain-assistance-pesticide-labeling-issues#. Ways to Obtain Assistance on Pesticide Labeling Issues | US EPA. Accessed 7/23/25.
[9] https://ncga.com/stay-informed/media/the-corn-economy/article/2025/05/the-economic-benefits-of-pesticides-to-farmers-and-society. The Economic Benefits of Pesticides to Farmers & Society. Accessed 7/23/25.

review and are supported by the United States Department of Agriculture (USDA), the Food and Drug Administration (FDA), as well as state-led regulatory agencies. EPA's rigorous regulatory process reviews products at least every 15 years and has deemed atrazine and glyphosate, two pesticides commonly used in corn production, safe for intended use since 1958 and 1974, respectively.

**NCGA recommends that the MAHA Policy Recommendation Report support full congressional funding of EPA's Office of Pesticide Programs (OPP) at the Pesticide Registration Improvement Act (PRIA) 5 statutory level of $166 million.** In recent years, OPP's congressional funding has fallen well below statutorily mandated levels.[10] Adequate OPP funding is essential to enable the EPA to complete its ongoing scientific safety reviews of existing pesticides on time and to facilitate the development/refinement of existing or new processes. Fully funded pesticide programs will enable more efficient processes, providing growers with quicker access to effective and new-generation technologies for crop production.




Precision Agriculture and Pesticide Application

**NCGA recommends that the MAHA Policy Recommendation Report highlight the critical role of precision agriculture in pesticide application.** Investing in new and innovative technologies results in a more targeted approach to pesticide application, which reduces the total amount of product used while maintaining yields. Senator Fisher (NE) recently reintroduced a legislative Precision Agriculture Package,

[10] Pesticide Program Dialogue Committee Meeting Nov 13-14, 2025. OPP Update. a.-opp-update-nov-2024.pptx. Accessed 7/21/25.

comprised of three different bills aimed at facilitating precision application investments. Precision agriculture leverages technologies to more efficiently use critical inputs, such as land, water, fuel, fertilizer, and pesticides. With these tools, farmers can maintain high outputs while using fewer resources.

Given the growing importance of emerging technology in agriculture, including pesticide application, we believe that addressing these advancements in the August Strategy would be both timely and appropriate.

**Further, NCGA recommends that USDA provide increased funding for independent agricultural-based research that addresses topics such as precision applications, pesticide resistance and integrated pest management.**

Addressing Herbicide Resistance

**NCGA recommends that the Natural Resources Conservation Service (NRCS) actively explore how Conservation Practice Standards can be used to help farmers manage weeds in conservation tillage systems while minimizing the development of herbicide-resistant weeds.** Deep and broad expertise in weed science, agronomy, and conservation is needed to generate such programming. We suggest that such expertise be best assembled by drawing upon conservation experts and research scientists from within and outside of the many relevant USDA agencies, as well as farmers, conservation practitioners, and professional agronomists. The objective would be to create a science-based, effective, practical, and affordable national conservation practice standard (CPS), or to amend existing standards, that details how successful weed management can be practiced in the context of conservation tillage, cover crops or other conservation systems, while also reducing the development of herbicide-resistant weeds. For example, amendments could be made to CPS 595, the Pest Management Conservation System (PMCS) standard, as well as the Residue and Tillage Management standards (No-Till, Code 329, and Reduced Till, Code 345). PMCS is grounded in Integrated Pest Management (IPM) principles that, in theory, are directly applicable and relevant to managing weed resistance to herbicides.

Agricultural Stakeholder Engagement

**NCGA recommends that the MAHA Commission initiate a formalized continuous engagement process with farmers of various crops, representing different production scales and methods, moving forward.** The MAHA Assessment suggested radical transparency and building a world where "American farmers are put at the center of how we think about health". This transparency starts with the Commission's understanding of the precision being used by farmers to ensure safe and abundant food supplies, irrespective of crop, operation size, or methodology. It should be recognized that farmers and their families live, work, and play in the same communities, and eat the same food as the rest of the nation. Farmers want what is best for the nation's health. As stewards of the land, farmers understand the responsibility of creating a more environmentally and economically sustainable world for future

NATIONAL CORN GROWERS ASSOCIATION

generations with transparency and through continued advances and efficiencies in land, water, and energy use.

NCGA looks forward to the continued opportunity to collaborate with the MAHA Commission as we strive to ensure the health of Americans.

Sincerely,

Kenneth R Hartman Jr.

Kenneth R. Hartman Jr.
President
National Corn Growers Association

Cc (via email):

1. Calley Means, Senior Advisor for MAHA
2. Hailey Borden, Special Assistant to the President and Director of Business Outreach
3. Karalee Geis, Senior Associate Director (Health), Office of Public Liaison
4. Jason Becker, Deputy Associate Director (Agriculture), Office of Public Liaison
5. Jackson Allen, Associate Director, Domestic Policy Council
6. Audra Weeks, Director of External and Intergovernmental Affairs, USDA
7. Darcie Johnston, Director of External and Intergovernmental Affairs, HHS
8. Turner Bridgforth, Senior Agriculture Advisor, EPA

**NATIONAL OFFICE:** MAIL TO: P.O. BOX 407 | CHESTERFIELD, MO 63006
632 CEPI DR. CHESTERFIELD, MO 63005 | 636-733-9004

**WASHINGTON DC:** 20 F STREET NW, SUITE 900, WASHINGTON, DC 20001 | 202-628-7001