



We Feed You

PUBLIC POLICY POSITIONS

Adopted by the Board of Directors
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Contact Us:

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www.foodnorthwest.org

MISSION STATEMENT

Food Northwest is a trade association organized to advance the ability of the food industry to produce and deliver wholesome, safe food from the Pacific Northwest to the world. We advance our success in feeding the world through advocacy, education and peer collaboration. Our government affairs program is the cornerstone of our advocacy work. This Public Policy Positions document, developed by the food companies, serves as a guide and resource and assists us in navigating the legislative and regulatory environments.

www.foodnorthwest.org

CONTENT

Public Policy Development and Adoption;.....	6
Food Northwest Philosophy	
I. Food Safety Policy	8
II. Labeling Policy	10
III. Energy and Environmental Policy	11
IV. Labor Policy	17
V. Tax Policy	18

PUBLIC POLICY DEVELOPMENT AND ADOPTION

- All policy positions must be adopted by a majority vote of the Food Northwest Board of Directors
- Any standing committee of Food Northwest may submit a policy recommendation to the Board of Directors following consultation between the appropriate subject matter committee and the Government Affairs Committee

NOTE: Positions on state ballot initiatives and individual legislation are not considered public policy positions of Food Northwest.

FOOD NORTHWEST PHILOSOPHY

Food Northwest advocates for policies and programs that contribute to sustainability, whether the issue is food safety, energy, environment, workforce or tax policies. Sustainability is the overarching philosophy that guides our efforts in all areas of concern. Sustainable practices ensure the continued viability of the food industry.

Sustainability is often described as a three-legged stool with social (people), environmental (planet) and economic (profit) each representing a leg of the stool. These three legs are commonly referred to as the “triple bottom line.”

Social sustainability is the positive effect that the food industry has on society through community investment. This includes providing safe and nutritious food, safe jobs, and community development. Environmental sustainability or environmental stewardship is critical to a sustained food industry. Through its raw products, the food industry is directly tied to the environment. Economic sustainability assures that the food industry is viable for the long term by managing according to principles that support the environment and the community as well as the industry’s economic well-being. A sustainable company operates so that its employees, customers, partners, communities and shareholders all benefit.

I

FOOD SAFETY POLICY

1.00 Food Safety Statement

Food Northwest members are committed to producing safe and wholesome food products. Strong, adequately funded state and federal food safety regulatory agencies are fundamental to achieving this goal. Food safety and defense programs must be scientifically sound and risk-based in order to be effective. Additionally, regulatory standards must be outcome-focused to allow the food industry latitude, within scientific and industry guidelines, to creatively solve food safety issues.

1.01 Food Safety and Modernization Act (FSMA)

Food Northwest recognizes the contribution that the new FSMA rules make to the safety of our nation's human and animal food supplies. FSMA rules call for enhanced partnerships between federal, state, local, and tribal authorities to achieve an integrated food safety system. Food Northwest encourages and supports a partnership between the state Departments of Agriculture in the Northwest and the FDA that promotes science-based best practices while ensuring the economic vitality of the food processing industry.

I FOOD SAFETY POLICY

1.02 Food Safety Fees

Food Northwest supports the adequate funding of state and federal food safety regulatory bodies to exercise scientifically sound, risk-based programs to protect the food supply. Food safety regulation programs constitute a basic function of government which is to protect public health. Therefore, food safety programs should be funded through general or appropriated funds to the fullest extent possible. Regulatory agencies should not be beholden to industry for the continuance of their programs. Inspection fees constitute an indirect tax (and double taxation) to consumers. This action penalizes lower income consumers as their food dollar is a disproportionately larger share of their income than higher income consumers.

1.03 Cottage Foods

Food Northwest supports the ability for small scale processors to establish viable businesses. At the same time, consumers should have access to the same level of food safety regardless of where or from whom they buy their food. Food Safety laws should not be compromised for smaller companies. Rather, they should be tailored to their unique needs. States should model their regulations for very small companies after guidance created by the Association of Food and Drug Officials (AFDO).

2.00 Food Northwest Labeling Statement

Individual state labeling regulations impact the production and distribution of food nationally. Food Northwest members support nationally uniform labeling policies because uniform labeling minimizes confusion, increases consumer confidence, and helps control labeling and distribution costs to consumers. Food Northwest adheres to FDA labeling requirements that mandate foods that are “substantially different” must be labeled.

2.01 State Genetically Engineered Food Labeling

Food Northwest supports a voluntary system to label foods produced with genetically engineered (GE) ingredients. Mandatory state based labeling systems of GE foods would create unreliable information to our customers across state boundaries and would increase supply chain costs. Food Northwest supports all types and methods of agricultural production and believes it is up to the producer and processor to create differentiation in the marketplace.

2.02 Ingredient and Nutrition Panels

Food Northwest supports the use of a science-based approach when deciding what goes on a nutrition panel. The “real estate” on a package is limited and we need to provide consumers with information that helps them make an informed purchasing decision based on sound science.



ENERGY AND ENVIRONMENTAL POLICY

3.00 Food Northwest's Energy Goal

In 2009, Food Northwest was the first industry group in the nation to adopt a goal to accelerate the implementation of energy efficiency strategies to reduce member-wide energy intensity by 25% in 10 years and through innovation, new technologies and new resources, achieve a total reduction of 50% in 20 years. This goal is consistent with the United States Department of Energy's Better Buildings, Better Plants program. Our members recognize that the most effective way to manage energy costs, reduce greenhouse gas emissions, and at the same time increase productivity and economic growth is through greater implementation of energy efficiency. Energy efficiency plays a key role in sustainability and in ensuring that Food Northwest members remain competitive.

3.01 Energy Incentive Program

Programs should work efficiently and effectively. Programs that require competitive bidding, stringent barriers to application, and uncertainty of award will not encourage the kind of investment in new equipment or practices that will help reduce energy usage. States should explore where existing programs and activities can be leveraged before moving forward on efforts that may be duplicative and require taxpayers or ratepayers to fund programs and services that may already be funded elsewhere.

3.02 Biomass

Food processing residues (waste and by-products from food processing) should be recognized as biomass under state law.



ENERGY AND ENVIRONMENTAL POLICY

3.03 Low Carbon Fuel Standard

In general, Food Northwest supports programs to promote the use of renewable fuels and reduce greenhouse gas emissions from fossil fuels. However, Food Northwest opposes state and federally-mandated use of low carbon fuels produced from human food and animal feed (e.g., corn and soybeans). Such mandates have a direct impact on food and feed prices. Because such crops are currently the only way to achieve low carbon fuel standards, their diversion to fuel production puts significant upward pressure on food and feed costs. Instead, states should promote research and development of second generation biofuels.

3.04 Hydropower

Renewable energy goals should allow greater compliance flexibility and hydropower should be recognized as a renewable source of energy.

3.05 Legislative or Regulatory Requirements that Increase Energy Costs

Because food processors in the Northwest are often far removed from markets and the cost of transporting goods to market can put the region at a competitive disadvantage, every effort should be made to promote stable and competitive energy costs. The Northwest has benefitted from affordable energy costs and this has attracted manufacturers and jobs to the region despite distance from markets. Food Northwest does not support proposals that would increase the cost of energy with negligible benefits to food processors and the regional economy.



ENERGY AND ENVIRONMENTAL POLICY

3.06 Carbon Reduction

Food Northwest shares the goal to protect and improve the environment and reduce greenhouse gas emissions. However, Food Northwest opposes state solutions that would impose carbon taxes or mandate cap and trade. Such approaches will increase the price of energy and make food processors in those states less competitive while having little impact on overall carbon reduction. Climate change and greenhouse gas emissions are a global issue and a single national program is the best approach to addressing a global issue. At the state and federal level, Food Northwest supports policies that address greenhouse gas emissions directly and through collaboration between industry and government. Food Northwest supports incentives and innovative programs that promote and advance voluntary reductions in greenhouse gas emissions.

3.07 Renewable Portfolio Standards

Food Northwest supports development of renewable resources, but is concerned about the upward pressure on electric rates caused by renewables standards that require acquisition of renewable resources on a mandated schedule rather than on a determined need for additional energy resources. Compliance flexibility should be allowed within portfolios.



ENERGY AND ENVIRONMENTAL POLICY

3.08 Energy Efficiency as a Resource

Energy efficiency should be the resource of first choice. It is the cleanest, cheapest and most readily available energy resource. It can be implemented now to help food processors and other manufacturers compete in the global marketplace, to promote energy independence, to reduce greenhouse gas emissions, and to create and retain jobs. Energy efficiency can be achieved at one-third the cost of new generating resources and can offset the need to add new generation or install or upgrade transmission and distribution equipment. Energy efficiency is a key component in any carbon reduction effort.

3.09 Combined Heat and Power (CHP) and Distributed Generation

Combined heat and power is an efficient and clean approach to generating electric power and useful thermal energy from a single source at an industrial facility. CHP helps businesses weather supply disruptions and price volatility while reducing greenhouse gas emissions and increasing resiliency and reliability of energy infrastructure by limiting congestion and offsetting transmission losses. Food Northwest has been working to promote CHP and is a partner in US Department of Energy's CHP Technical Assistance Partnership. Food Northwest supports treatment of CHP as an energy efficiency resource and its eligibility for incentives and support.



ENERGY AND ENVIRONMENTAL POLICY

3.10 Water-Energy Nexus

Water is a critical input to agriculture and the food industry and water supply and availability are becoming significant concerns. Energy and water are interconnected as energy is used to pump and transport water for distribution as well as heat or cool water for use in food processing. Efficiencies achieved in energy can produce efficiencies in water use and vice versa. Food Northwest supports the work of US Department of Energy's Water Energy Tech Team to identify and pursue technologies, modeling, and analysis to enhance effectiveness and efficiency in both water and energy use.

3.11 Environmental Legislation and Regulations

Food Northwest believes that environmental policies, legislation and regulations related to land, water quality, air quality, human health criteria, and greenhouse gas reductions must be subject to a thorough and open public debate and must be based in sound science. Consideration should be given to the costs and benefits of any environmental regulation, including the impact on the state's economy and workforce. In addition, any strategy adopted must not disadvantage food processors that compete in the global marketplace or in domestic markets with less stringent environmental requirements. Food Northwest advocates use of incentives to offset the costs of compliance to assure competitiveness of the Northwest food industry.



ENERGY AND ENVIRONMENTAL POLICY

3.12 Human Health Criteria Standards

Human health criteria for water and air quality standards must be grounded in sound science. Policymakers should recognize that technological advancements allow for the detection of substances to miniscule amounts. Just because a substance can be detected does not mean its presence at this detection level is toxic. Quality standards must be scientifically justifiable, supported by technical information, and in fact protect the public health. These factors must be taken into account in order to develop a balanced approach to environmental policy and regulation.

3.13 Food Packaging

Any regulation of food packaging should be conducted at the federal level rather than the state level. Because many food companies ship product to several states, compliance with a patchwork of state regulations will create a hardship and increased costs for food processors.

3.14 Fees

Agency fees should be directly related to the specific service provided the fee payer and should not fund other program elements or be used for general revenue.



LABOR POLICY

4.00 Food Northwest Labor Statement

The ability to produce a safe and stable domestic food supply is a national security issue for the United States. Therefore, it is critical that as we reform our nation's immigration laws, we give special consideration to the unique circumstances and needs of agriculture.

4.01 National Labor Policy

Congress is considering a variety of measures that could potentially affect the US labor market. If enacted alone, they would have serious unintended consequences for agriculture and other sectors. Food Northwest supports a comprehensive package that can ensure both US security and meets the needs of US employers. A viable guest worker program, border enforcement and pre-employment verification are items that need to be addressed together to mitigate any consequences to the agriculture/food processing industry.

4.02 State Labor Policy

Food Northwest supports a consistent labor policy throughout a given state. A patchwork of labor law does not provide the consistency needed for operations that are located in multiple jurisdictions. Food Northwest supports state initiatives aimed at retaining a qualified workforce. Food Northwest opposes any mandates that increase the cost of labor and/or remove the ability of food processors to decide what benefits they offer their workforce.



TAX POLICY

5.00 Food Northwest Tax Statement

State and federal taxes have a large impact on food processors' ability to be competitive in a global market place. The tax structure must be built on a sound basis for the general benefit of business and for encouraging individual enterprise. In general, property taxes should be used to finance property related services and a tax based on a person's ability to pay should be used to finance services that are for the general benefit of society.

5.01 Tax Raising Measures

We support a "super majority" requirement in the Legislature when voting on measures that raise tax rates.

5.02 Business Tax Credits

Food Northwest supports business tax credits that promote economic development for the food and beverage industry. We support the use of all tax credits against total tax liability.

5.03 Tax Reform

Tax reform proposals must promote job creation, economic development and capital investment. Any tax reform proposal must treat food producers equitably with other sectors of the economy.

Food Northwest

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