



We Feed You

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PUBLIC POLICY POSITIONS

Adopted by the Board of Directors
February 19, 2025



CONTACT US:

503.327.2200

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.

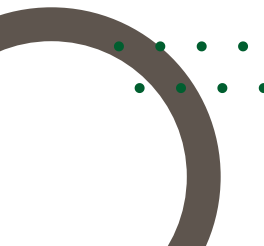


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PUBLIC POLICY DEVELOPMENT AND ADOPTION

- 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 wellbeing. 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).





II. PACKAGING POLICY

2.00 Packaging

Food Northwest recognizes that the primary purpose of food packaging is to ensure food safety and maintaining food quality. Regulations regarding packaging should first and foremost not reduce food safety or quality, including shortening shelf life. Decreasing shelf life through packaging regulations hurts consumers and leads to unintended consequences including increased food waste.

Food Northwest supports national standards for food packaging safety and efficacy. Food Northwest opposes policies that limit, ban, or increase the costs for FDA-approved packaging materials for food products.

Packaging is also used as a key brand identification method and informs consumers about product ingredients, nutritional and other pertinent information. Food Northwest opposes policies that limit, ban, or increase the cost of inks or labeling materials or other visual signifiers used in branding or labeling that do not come in contact with food.

2.01 Extended Producer Responsibility

Food Northwest supports recycling programs that are efficient and promote a circular economy. Extended Producer Responsibility (EPR) legislation and regulations should not encourage or require packaging materials that reduce food safety or quality. Fees collected under EPR schemes should be directed to research, development, and availability of FDA-approved packaging that does not diminish food safety or quality and is more easily recyclable. EPR policies should not be applied in ways that undermine or supplant existing recycling programs.

II. PACKAGING POLICY

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2.01 Extended Producer Responsibility Cont'd

EPR programs should not penalize use of packaging that is recyclable. The program should not penalize use of recyclable packaging based on the lack of a marketplace for the recycled content. EPR programs should exempt packaging used in business to business transactions because these materials do not enter public waste and recycling systems. EPR programs should assess fees on the owner of the brand identified on the product label at point of sale because this entity is the decision-maker about packaging design and materials selection.

2.02 Recycled Content

Food Northwest supports using recycled content in packaging as long as that packaging meets food safety design criteria. Programs requiring higher percentages of recycled content should keep pace with available supply of recycled materials in the markets where the programs operate.

2.03 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.

II. PACKAGING POLICY

2.04 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.

2.05 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.



III. ENERGY POLICY

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3.00 Food Northwest Energy Goal

Oregon (HB2021) and Washington (SB5116) set targets to achieve 100% clean electricity by 2040 and 2045, respectively. Idaho Power set a goal to provide 100% clean energy by 2045. At the same time, artificial intelligence and the proliferation of data centers will add a significant additional electricity demand. Investments to achieve the states' goals and meet electricity demand will impose huge costs on energy users. The overarching priority must be an adequate, economical, and reliable power supply. Electrification and decarbonization cannot occur economically and reliably according to arbitrary schedules set by legislation and regulation.

Food Northwest acknowledges the need to protect and improve the environment and to reduce greenhouse gas (GHG) emissions. 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. Having achieved our goal, we are focused on the decarbonization of food processing in addition to energy efficiency.

3.01 Low Carbon/Clean 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.




III. ENERGY POLICY

3.02 Energy Incentive Programs

Financial incentives and technical assistance for implementing energy management and capital projects at industrial facilities are critical to achieving energy and climate goals. In its Industrial Decarbonization Roadmap, the U.S. Department of Energy identifies the low margins of food and beverage companies as a limiting factor to upfront capital investments in decarbonization. Climate program compliance costs, natural gas and electric rate increases, commodity cost increases, and other costly regulatory programs, like Extended Producer Responsibility programs, will compete with capital budgets. Federal, state, and utility investments in food processing and other manufacturing will assist and accelerate the implementation of decarbonization in manufacturing and will help reduce emissions, strengthen rural economies, and improve the environment. Energy incentives have primarily focused on electricity but must also be available for natural gas and other fuels.

3.03 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, attracting 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.




III. ENERGY POLICY

3.04 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. Energy efficiency can be implemented now to help food processors and other manufacturers compete in the global marketplace, promote energy independence, reduce greenhouse gas emissions, and create and retain jobs. Energy efficiency can be achieved at one-third the cost of new generating resources, offset demand for energy resources (including natural gas and other fuels), and reduce demand on the grid. Energy efficiency is a key component in any carbon reduction effort.

3.05 Combined Heat and Power

Combined heat and power (CHP) 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. It increases the 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 the US Department of Energy's CHP Technical Assistance Partnership. Food Northwest supports the treatment of CHP as an energy-efficiency resource and its eligibility for incentives and support. We recognize that CHP is not an option for all food processors and may only be appropriate for very large facilities with the expert staff required to implement it.



IV. CLIMATE POLICY

4.01 Industrial Carbon Reduction

Food Northwest is committed to leading the way in industrial carbon reduction for food processing.

Greenhouse gas emissions are a global issue. We believe a single national program is the best approach for reducing GHG emissions. However, all state or federal carbon reduction programs must include the following elements:

- Food processing must be recognized as an Energy-Intense Trade-Exposed (EITE) sector.
- There must be protections and measures for EITEs to avoid economic leakage and greenhouse gas emissions leakage. EITE compliance pathways must be based on carbon intensity and economic and technical feasibility.
- There must be controls and measures to reduce the impacts of volatile and escalating energy costs, including transportation fuels, natural gas or other fuel pricing, which affect industry in secondary ways.
- There must be controls and measures to avoid excessive costs of allowances and credits.
- Projects, programs, and activities funded by auction or allowance/credit proceeds must reduce greenhouse gas emissions or promote adaption and resiliency to climate impacts.
- Funding for greenhouse gas emission reduction projects must be available to EITEs, including those who are covered entities.
- Programs or projects funded by auction or allowance/credit proceeds must prioritize energy efficiency measures within industrial processes, promoting the use of cleaner energy sources and technologies to minimize carbon emissions per unit of production.





IV. CLIMATE POLICY

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- Funded projects shall encourage innovation and the adoption of low-carbon technologies, fostering research and development efforts to improve industrial processes and reduce carbon footprints. Projects should not result in excessive implementation costs that negatively impact consumers or production costs.
- Offsets must be available as a compliance option and include carbon sequestration on natural and working lands.
- Carbon reduction programs must be transparent and account for the expenditure of proceeds and revenues. Proceeds and revenues must not be used to support programs and activities currently funded by the jurisdiction's General Fund.
- Linkage with other jurisdictions should be pursued only when evaluation shows that doing so will not increase compliance obligations or costs for covered entities, will maintain protections for EITEs, will mitigate allowance price volatility and lead to lower allowance prices, and provide consistent requirements for covered entities operating in more than one jurisdiction.



V. ENVIRONMENTAL AND WASTE POLICY

5.00 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.

5.01 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.

V. ENVIRONMENTAL AND WASTE POLICY

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5.03 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.

5.04 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.





VI. LABOR POLICY

6.00 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 our nation's immigration laws fully recognize and address the unique circumstances and needs of agriculture.

6.01 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, the food companies that rely on 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.

6.02 State Labor Policy

Food Northwest supports state initiatives aimed at building and retaining a qualified workforce. Food Northwest opposes any mandates that increase the cost of labor and/or limit the ability of food processors to decide what benefits they offer their workforce or how employees are evaluated and/or incentivized. Food Northwest opposes policies that interfere with employers' ability to communicate with employees. State labor laws should be enforced by the appropriate public agencies. Food Northwest opposes new private rights of action in employment matters.



VI. LABOR POLICY

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6.03 Food Northwest Immigration Policy

Long-term downward demographic trends are reducing the availability of domestic employees. Food Northwest supports new programs that ensure flexibility to employers and mobility to workers, based on labor market needs. Alongside these reforms, we encourage an opportunity for earned legal status for out-of-status workers already present in the United States. State laws should be standardized for regulating the terms and conditions of employment of workers under federal visa programs to provide clear, consistent guidance on the rights and obligations of employers and workers. Federal reform should include employee verification and enforcement processes by establishing clear, consistent standards that promote a legal workforce while protecting employers from undue costs, compliance risks, and unrealistic demands. Reforms should include improving the I-9 audit process using clear and transparent metrics and pre-employment verification error rates must be significantly lower before they are mandated.



VII. TAX POLICY

7.00 Food Northwest Tax Statement

State and federal taxes have a large impact on food processors' ability to be competitive in a global marketplace. 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 company's ability to pay (not gross revenue) should be used to finance services that are for the general benefit of society.

7.01 Tax Raising Measures

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

7.02 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. Food Northwest supports tax incentives for the implementation of energy efficiency and transformation, carbon reduction, and other environmental measures.

7.03 Tax Reform

Tax reform proposals must promote job creation, economic development, and capital investment.



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8338 NE Alderwood Road
Suite 160
Portland, Oregon 97220