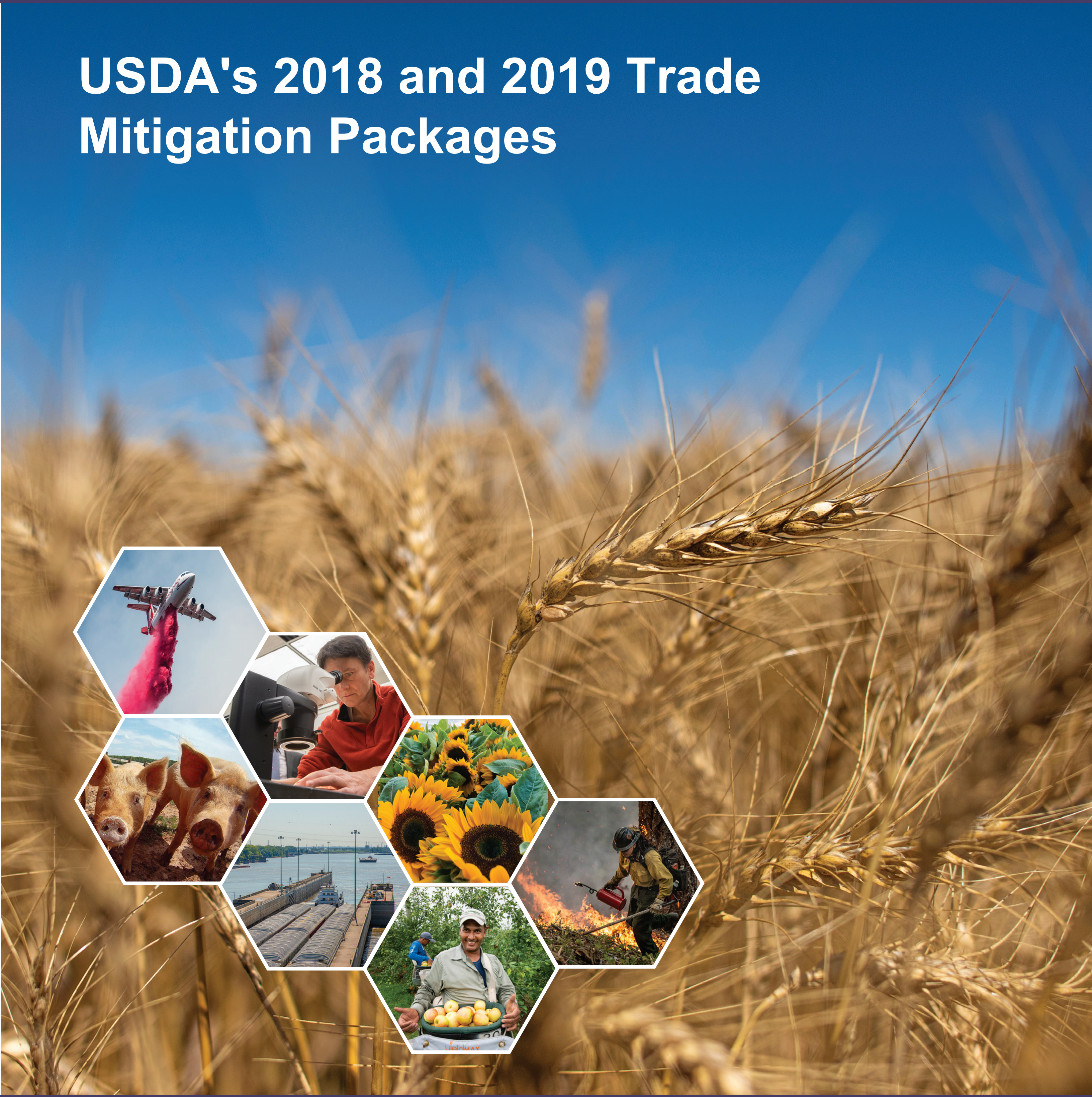
United States Department of Agriculture

USDA's 2018 and 2019 Trade Mitigation Packages



Audit Report 50601-0009-31

May 2020

OFFICE OF INSPECTOR GENERAL

USDA's 2018 and 2019 Trade Mitigation Packages

Audit Report 50601-0009-31

OIG evaluated USDA's design of the 2018 and 2019 trade mitigation packages.

OBJECTIVE

We evaluated USDA's design of the 2018 and 2019 trade mitigation packages.

REVIEWED

We reviewed applicable laws and regulations related to the trade mitigation packages and examined CCC's authority, including borrowing limits, as it relates to the trade mitigation packages. We also interviewed relevant USDA officials and reviewed USDA's trade damage analysis conducted by the Office of Chief Economist.

RECOMMENDS

We are not making any recommendations.

WHAT OIG FOUND

In July 2018, in response to the President's direction to craft a short-term relief strategy for agricultural producers, the Secretary of the United States Department of Agriculture (USDA) announced a trade mitigation package that authorized up to $12 billion in assistance to producers in response to trade damage from retaliatory tariffs imposed by foreign nations. USDA also notified Congress that it would provide financial assistance to producers with commodities significantly impacted by the imposition of retaliatory tariffs by other countries, aid in the disposition of surplus commodities, and assist in the development of new export markets for farm products. Further, in May 2019, the Secretary announced a second trade mitigation package, which authorized up to $16 billion in additional support.

We determined that USDA's actions designing the trade mitigation packages are within its authority and powers designated under the Commodity Credit Corporation (CCC) Charter Act. We reviewed financial records and reports and found that CCC controls ensured USDA did not exceed its borrowing authority in offering the trade mitigation packages. Further, at the time of this review, we determined USDA's approach for estimating trade damage was supported by a reasonable methodology and was applied consistently across commodities. Departmental officials agreed with our determinations. Accordingly, we are not making any recommendations in this report.

United States Department of Agriculture
Office of Inspector General
Washington, D.C. 20250

DATE: May 11, 2020

AUDIT NUMBER: 50601-0009-31

TO: Richard Fordyce
Administrator
Farm Service Agency

Robert Johansson
Chief Economist
Office of the Chief Economist

ATTN: William Northey
Under Secretary
Farm Production and Conservation

FROM: Gil H. Harden
Assistant Inspector General for Audit

SUBJECT: USDA's 2018 and 2019 Trade Mitigation Packages

This report presents the results of the subject review. We are not making any recommendations in this report. No further action by your staff is required.

We appreciate the courtesies and cooperation extended to us by members of your staff during our audit fieldwork and subsequent discussions. This report contains publicly available information and will be posted in its entirety to our website (http://www.usda.gov/oig) in the near future.

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Background and Objectives

Background

On July 24, 2018, in response to the President's direction to craft a short-term relief strategy for agricultural producers, the Secretary of the United States Department of Agriculture (USDA) announced a trade mitigation package that authorized up to $12 billion in assistance to producers in response to trade damage from retaliatory tariffs imposed by foreign nations.[1] USDA also notified Congress that it would provide financial assistance to producers with commodities significantly impacted by the imposition of retaliatory tariffs by other countries, aid in the disposition of surplus commodities, and assist in the development of new export markets for farm products.[2] Further, on May 23, 2019, the Secretary announced a second trade mitigation package and again notified Congress.[3] The trade mitigation package of 2019 authorized up to $16 billion in additional support.

USDA announced it was offering the trade mitigation packages under the Commodity Credit Corporation (CCC) Charter Act.[4] USDA has previously exercised this authority to offer the Biofuels Infrastructure Partnership in June 2015 and the Cotton Ginning Cost Share program in June 2016 and March 2018.[5] In recent years, Congress has lifted prior funding restrictions on actions permitted under the CCC Charter Act.[6] In 2019, Congress also expanded the categories of individuals who could receive certain trade mitigation payments by loosening certain income restrictions.[7]

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[1] USDA Press Release No. 0151.18, "USDA Assists Farmers Impacted by Unjustified Retaliation" (July 24, 2018). The "trade mitigation packages" are short-term protections to ensure that U.S. agricultural producers do not bear the brunt of retaliatory tariffs imposed by foreign nations.

[2] Purdue, George E., Secretary of Agriculture, Letters to Honorable Members of Congress (Aug. 31, 2018).

[3] USDA Press Release No. 0078.19, "USDA Announces Support for Farmers Impacted by Unjustified Retaliation and Trade Disruption" (May 23, 2019); Purdue, George E., Secretary of Agriculture, Letters to Honorable Members of Congress (May 29, 2019).

[4] Pub. L. No. 80-806, 62 Stat. 1070 (1948), as amended (codified at 15 U.S.C. §§ 714-714p). CCC serves as the financial institution for carrying out Federal farm commodity price support and production programs. The Secretary of Agriculture supervises and directs this wholly Government-owned entity, which exists solely to finance authorized programs that support U.S. agriculture.

[5] *Notice of Funds Availability; Biofuels Infrastructure Partnership (BIP) Grants to States*, 80 Fed. Reg. 34,363 (June 16, 2015); *Notice of Funds Availability; Cotton Ginning Cost-Share Program Payments to Cotton Producers,* 81 Fed. Reg. 36,861 (June 8, 2016); *Notice of Funds Availability; Cotton Ginning Cost-Share Program Payments to Cotton Producers,* 83 Fed. Reg. 9,825 (Mar. 8, 2018).

[6] The 2017 Appropriations Act specifically prohibited the use of appropriated funds for surplus removal activities or price support activities under section 5 of the CCC Charter Act. Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2017, Pub. L. No. 115-31, div. A, tit. VII, § 715, 131 Stat. 135, 169. The 2018, 2019, and 2020 Appropriations Acts did not include this prohibition. Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2018, Pub. L. No. 115-141, div. A, 132 Stat. 348, 351; Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2019, Pub. L. No. 116-6, div. B, 133 Stat. 13, 15; Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2020, Pub. L. No. 116-94, div. B (2019).

[7] Additional Supplemental Appropriations for Disaster Relief Act, 2019, Pub. L. No. 116-20, tit. I, § 103, 133 Stat. 871, 874.

The trade mitigation packages include the following three programs administered by USDA component agencies:

- Food Purchase and Distribution Program (FPDP), through USDA's Agricultural Marketing Service (AMS);
- Market Facilitation Program (MFP), through USDA's Farm Service Agency (FSA); and
- Agricultural Trade Promotion Program (ATP), through USDA's Foreign Agricultural Service (FAS).

OIG has initiated separate audits to evaluate the effectiveness and efficiency of program administration by the respective USDA agencies for each of these three programs.[8] During the course of planning these audits, OIG received a Congressional request to determine how USDA structured and implemented its trade mitigation package to assist farmers impacted by tariffs, whether the payments disbursed under the programs actually benefitted the farmers for who they were intended, and whether there was waste, fraud, and abuse in the trade mitigation package programs. These audits include work responsive to specific Congressional concerns.

Objectives

We evaluated USDA's design of the 2018 and 2019 trade mitigation packages.

[8] We are reviewing FPDP under Audit 01601-0003-41, MFP under Audit 03601-0003-31, and ATP under Audit 07601-0001-24.

Section 1: Evaluation of the 2018 and 2019 Trade Mitigation Packages' Design

We determined that USDA's actions designing the 2018 and 2019 trade mitigation packages are within its authority and powers. Specifically, USDA has the authority to create and fund trade mitigation programs through the CCC Charter Act. We reviewed financial records and reports and found that CCC controls, such as daily monitoring of its borrowing level, ensured that USDA did not exceed its borrowing authority in offering trade mitigation packages. Further, at the time of this review, we determined that USDA's approach for estimating trade damages was supported by a reasonable methodology and was applied consistently across commodities.

USDA's Authority to Provide Trade Mitigation Package Assistance

The CCC Charter Act provides the USDA Secretary with the authority to create and fund programs through CCC's borrowing authority. Specifically, the Secretary is authorized to "[r]emove and dispose of or aid in the removal or disposition of surplus agricultural commodities (other than tobacco)" and "[i]ncrease the domestic consumption of agricultural commodities (other than tobacco) by expanding or aiding in the expansion of domestic markets or by developing or aiding in the development of new and additional markets, marketing facilities, and uses for such commodities."[9] CCC borrows from the U.S. Treasury to finance its programs consistent with its permanent, indefinite authority to borrow up to $30 billion.[10] Congress replenishes CCC's borrowing authority by appropriating funding to cover CCC's net realized losses.[11]

Overall, we reviewed applicable laws, regulations, other Federal guidance, and CCC financial information and concluded that USDA has legal authority to design the 2018 and 2019 trade mitigation packages through CCC, and up to $30 billion of borrowing authority to fund them. USDA has previously exercised this authority to allocate $100 million to the Biofuels Infrastructure Partnership in June 2015 and $520 million collectively to the Cotton Ginning Cost Share program in June 2016 and March 2018. The trade mitigation packages did not receive specific appropriations by Congress. Rather, the $28 billion in total funding was derived from CCC authority, at the discretion of the Secretary. We reviewed financial records and reports and found that CCC controls, such as daily monitoring of its borrowing level, ensured that CCC did not

[9] 15 U.S.C. § 714c(d), (e).
[10] 15 U.S.C. § 714b(i).
[11] Net realized losses are outlays that CCC will never recover, such as the cost of commodities sold or donated, program payments, and operating expenses. GAO, *Commodity Credit Corporation: Information on the Availability, Use, and Management of Funds*, GAO/RCED-98-114, at 4 n.3 (Apr. 1998). The 2018 and 2019 Appropriations Acts, as well as a 2020 Continuing Appropriations Act, contained language regarding CCC's net realized losses. Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2018, Pub. L. No. 115-141, div. A, tit. II, 132 Stat. 364; Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2019, Pub. L. No. 116-6, div. B, tit. II, 133 Stat. 58; Continuing Appropriations Act, 2020, Pub. L. No. 116-59, div. A, § 119, 133 Stat. 1093, 1097.

exceed its borrowing authority through the implementation of the trade mitigation packages.[12]

USDA's Design of the Trade Mitigation Packages

USDA's Office of the Chief Economist (OCE) determined the overall funding for the trade mitigation packages based on economic analyses of commodities affected by other countries' retaliatory tariffs.[13] The commodities include non-specialty crops (grains and oilseeds), specialty crops (nuts and fruits), and animal products (hogs and dairy).[14] Overall, a total of 60 commodities were covered between the 2018 and 2019 trade mitigation packages (see Exhibit A for a list of eligible commodities). Additionally, 59 organizations received funding to help develop new export markets (see Exhibit B for a list of the organizations).

For the 2018 trade mitigation package, USDA estimated trade damages to be over $10.8 billion. The Department apportioned $12 billion in funding for that year. USDA officials stated that the $12 billion apportionment was higher than the $10.8 billion estimated due to uncertainty in rolling out the trade mitigation package in its first year.[15] For the 2019 trade mitigation package, USDA performed a similar analysis and estimated trade damages at over $18.2 billion. The Department apportioned $16 billion in funding for that year. USDA officials stated that the $16 billion apportionment was lower than the $18.2 billion estimated due to lessons learned from the 2018 trade mitigation package, which enabled USDA to be more precise.[16]

For the affected commodities, USDA based its trade mitigation assistance levels on its trade damage estimates. Specifically, OCE used an off-the-shelf software package to create an economic model and predict estimated gross trade damages for impacted commodities.[17] OCE entered historical trade data, as well as retaliatory tariff data, into

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[12] At the end of the 2019 fiscal year, CCC's debt rose to about $25 billion out of its $30 billion borrowing authority before being replenished with additional appropriations.

[13] USDA used Global Agricultural Information Network reports, which are published by USDA's FAS, to identify which commodities were subjected to retaliatory tariffs: https://gain.fas.usda.gov.

[14] OCE officials stated that they attempted to incorporate all U.S. agricultural commodities that were subject to retaliatory tariffs by other countries in 2018 and 2019, with a focus on staying consistent with the traditional format of farm programs whereby producers visit FSA county offices to sign up. Additionally, certain commodities were included based on stakeholder feedback related to the effects of the retaliatory tariffs. For example, cherries were added to the trade mitigation package in 2018 and barley was added in 2019.

[15] OCE officials used 2017 production data to arrive at MFP payment rates; however, MFP payments were based on production from 2018, which was not known at the time USDA was designing the 2018 trade mitigation package. Consequently, USDA budgeted additional funds to cover any increase in production from 2017 to 2018.

[16] Overall, the inclusion of additional commodities increased the cost of the second trade mitigation package. However, in 2019, USDA apportioned less than the estimate because USDA applied the lessons it learned about income restrictions, payment limitations, and FPDP purchasing ability.

[17] OCE used an algebraic modeling system to estimate trade damages. OCE utilized a version of the Global Simulation Model to estimate the bilateral trade flows for each affected commodity. This approach reflects the level of tariffs and sensitivity of the trade partner's import demand to higher prices caused by additional tariffs. OCE included the availability of substitute suppliers and substitute demanders within the model. USDA OCE, "Trade Damage Estimation for the Market Facilitation Program and Food Purchase and Distribution Program" (Sept. 13, 2018).

the model to compare expected trade values with and without the tariffs, with the difference being the estimated trade damage for each affected commodity. OCE applied this same model to all commodities because tracking down which economic model would work best with each commodity did not allow for a timely response to retaliatory tariffs in the form of implementing the trade mitigation package.[18] According to OCE officials, USDA sought to be consistent with World Trade Organization principles used when resolving trade disputes.[19] OCE used historical data to determine estimated trade damages in 2018 and 2019 because actual data for those years were not yet available when the trade mitigation packages were being designed.

For example, in 2018, China and the European Union applied additional tariffs on U.S. corn. Based on the model used, OCE estimated that the value of U.S. corn exported to China and the European Union would fall over 62 percent, or about $192 million, for 2018. In another example, due to additional Chinese tariffs on U.S. soybeans, OCE estimated the value of U.S. soybeans exported to China would fall 52 percent, or over $7.2 billion, for 2018. Based on the 2017 nationwide production of these commodities, OCE calculated damages to be $0.01 per bushel for corn and $1.65 per bushel for soybeans.[20]

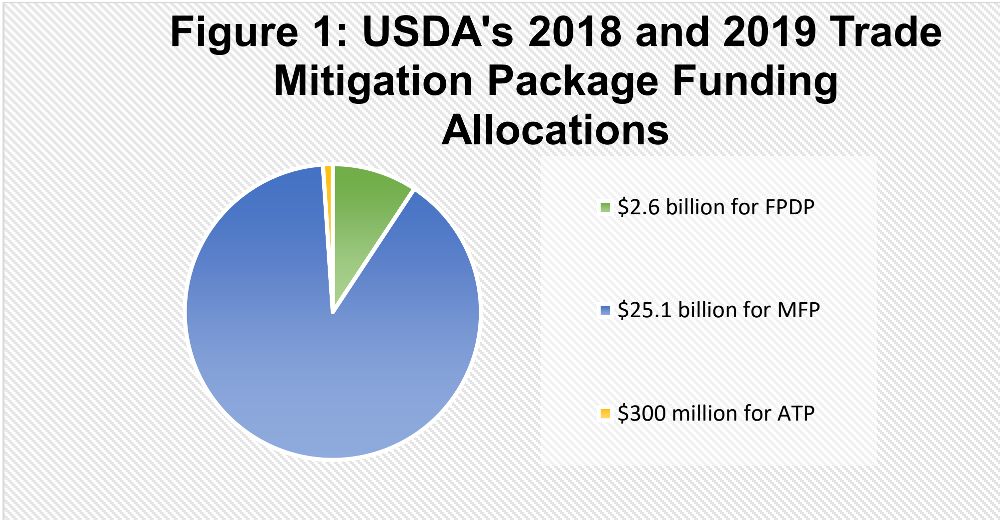
We reviewed OCE analysis of trade data for commodities included in the 2018 trade mitigation package. As part of our review, we recalculated the outputs of OCE's model for soybeans, pork/hogs, and dairy/milk, which totaled $8.7 billion or over 80 percent of the trade damages estimated for 2018. We confirmed that OCE consistently applied its single model across commodities. Further, we recognize that there will be variability in how well a single model will suit each commodity; however, at the time of this review, we determined that OCE's approach for estimating trade damages through a single model was reasonable.

USDA's Implementation of the Trade Mitigation Packages

USDA uses three of its component agencies to administer trade mitigation package assistance through three programs designed to assist agricultural producers facing disrupted markets—FPDP, MFP, and ATP. USDA's funding allocation to the three programs is shown in Figure 1:

[18] OCE officials acknowledged they received feedback from stakeholders (including economists and academics) that certain economic models were better suited for individual commodities.
[19] USDA OCE, "Trade Damage Estimation for the Market Facilitation Program and Food Purchase and Distribution Program" (Sept. 13, 2018).
[20] In 2018, OCE used over 14.6 billion bushels and over 4.3 billion bushels to determine damages for corn and soybeans, respectively. For the 2019 trade mitigation package, OCE took a similar approach, but used the average production between 2015 and 2017. This resulted in damages of $0.14 per bushel for corn and $2.05 per bushel for soybeans in 2019.

Figure 1: Trade Mitigation Program Funding Allocation Totals



First, USDA consulted AMS regarding the amount of commodities that could be purchased and distributed through FPDP, based on food perishability and the needs of food banks and food pantries.[21] In 2018 and 2019 collectively, FPDP received approximately $2.6 billion to buy U.S. food products such as pork, apples, dairy, and potatoes to distribute as food assistance.[22] AMS solicits products, including product type, volume, delivery destination, and delivery window, through a web-based supply chain management system. Once received, AMS evaluates offers based on offer prices and other factors, such as past performance, and awards one or more contracts to achieve the best value to the Government.

USDA then apportioned the balance of the estimated trade damages OCE calculated to FSA to implement MFP.[23] In 2018 and 2019 collectively, USDA apportioned approximately $25.1 billion for trade mitigation assistance payments through MFP. Producers of eligible commodities could apply for program payments during established sign up periods.[24] At a minimum, applicants must have met the following in order to be eligible for a payment: the applicants (1) had an ownership interest in the eligible commodity; (2) had an adjusted gross income that did not exceed $900,000 or an adjusted gross income exceeding $900,000 with at least 75 percent being derived from farming,

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[21] FPDP assists producers suffering from damage due to trade retaliation by foreign nations through the purchase of food products.
[22] For a full list of eligible commodities under FPDP each year, see Exhibit A.
[23] MFP provides direct payments to help producers directly impacted by retaliatory tariffs, resulting in the loss of traditional exports. *Market Facilitation Program*, 83 Fed. Reg. 44,173 (Aug. 30, 2018) as codified at 7 C.F.R. pt. 1409 (2019) (setting forth 2018 MFP regulations); *Trade Mitigation Program*, 84 Fed. Reg. 36,456 (July 29, 2019) (to be codified at 7 C.F.R. pt. 1409 (2020)) (setting forth 2019 MFP regulations).
[24] For a list of eligible commodities for MFP payments each year, see Exhibit A. The 2018 sign up period was September 4, 2018, through February 14, 2019. The 2019 sign up period was July 29 through December 20, 2019.

ranching, or forestry-related activities; and (3) had compliance with conservation provisions.[25]

As an example of this apportionment, the export value of pork and hogs to China and Mexico was expected to fall over 45 percent, or over $1.1 billion, for 2018. After consultation with AMS, USDA allocated $558.8 million to FPDP for purchases of pork and allocated the remaining balance of trade mitigation package funding to MFP for payments to hog farmers.

Lastly, USDA authorized FAS to administer ATP.[26] In 2018 and 2019 collectively, the Secretary allocated approximately $300 million to administer ATP. FAS solicits ATP applications through a web-based system. FAS approves applications that it considers to present the best opportunity for developing, maintaining, or expanding export markets for U.S. agricultural commodities based on factors including market opportunity, market strategy, and management capability.[27]

We determined that USDA's actions to design the trade mitigation packages are within its authority and powers designated under the CCC Charter Act. We also determined that CCC's controls ensured that it did not exceed its borrowing authority in offering the trade mitigation packages. Departmental officials agreed with our conclusion. Accordingly, we are not making any recommendations in this report.

[25] 7 C.F.R. pt. 1400 (payment limitation and payment eligibility); 84 Fed. Reg. 36,456 (amending MFP regulations for 2019 program assistance). Conservation provisions include highly erodible land and wetland conservation requirements. In addition to the requirements stated above, producers of certain commodities were required to provide significant contributions to the farming operation to be considered as actively engaged.

[26] ATP helps U.S. agricultural exporters develop new markets and mitigate the adverse effects of other countries' tariff and non-tariff barriers through cost-share assistance for activities such as consumer advertising, public relations, and participation in trade fairs. Agricultural Trade Promotion Program, 83 Fed. Reg. 44,178 (Aug. 30, 2018) as codified at 7 C.F.R. pt. 1489.

[27] 7 C.F.R. § 1489.14(a).

Scope and Methodology

We conducted our audit at USDA's office in Washington, D.C. Our audit covered USDA's trade mitigation packages of 2018 and 2019 for which the Department authorized up to $28 billion in assistance.[28] We performed fieldwork between August 2019 and February 2020.

To accomplish our objectives, we performed the following audit procedures:

- reviewed applicable laws and regulations related to the trade mitigation packages;
- researched Congressional interest in and media coverage of the trade mitigation packages;
- examined CCC's authority, including borrowing limits, as it relates to the trade mitigation packages;
- obtained and reviewed relevant financial records and reports;
- interviewed OCE officials to determine how the trade mitigation packages were designed;
- obtained and reviewed relevant tariff and trade information;
- gained an understanding of the modeling system used to estimate trade damages as the result of retaliatory tariffs;
- reviewed USDA's OCE trade damage analysis; and
- discussed the results of our fieldwork with relevant Department/agency officials.

During the course of our audit, we reviewed information and calculations. We did not perform any tests to determine the reliability of any information systems because evaluating the effectiveness of information systems was not one of our engagement objectives. We do not believe the lack of systems testing had an impact on our audit as we gained an understanding of the modeling system used to estimate trade damages.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

[28] The 2018 trade mitigation package provided up to $12 billion in assistance, and the 2019 trade mitigation package provided up to $16 billion in additional assistance.

Abbreviations

AMS.......................................Agricultural Marketing Service
ATP.......................................Agricultural Trade Promotion Program
CCC.......................................Commodity Credit Corporation
C.F.R.....................................Code of Federal Regulations
FAS.......................................Foreign Agricultural Service
Fed. Reg.................................Federal Register
FPDP.....................................Food Purchase and Distribution Program
FSA.......................................Farm Service Agency
MFP.......................................Market Facilitation Program
OCE.......................................Office of the Chief Economist
OIG.......................................Office of Inspector General
U.S.C.....................................United States Code
USDA....................................United States Department of Agriculture

Exhibit A: Commodities Eligible for FPDP and MFP Under the 2018 and 2019 Trade Mitigation Packages

The table below presents the 60 commodities eligible for FPDP and MFP under the trade mitigation packages of 2018 and 2019.

Count	Commodity	2018		2019	
		FPDP	MFP	FPDP	MFP
1	Alfalfa Hay				X
2	Almonds		X		X
3	Apples	X		X	
4	Apricots	X		X	
5	Barley				X
6	Beef	X		X	
7	Blueberries	X		X	
8	Canola				X
9	Cherries, Fresh Sweet		X		X
10	Chickpeas				X
11	Corn		X		X
12	Cotton		X		X
13	Crambe				X
14	Cranberries	X			X
15	Dairy	X	X	X	X
16	Dried Beans				X
17	Figs	X		X	
18	Flaxseed				X
19	Ginseng, Cultivated				X
20	Grapefruit	X		X	
21	Grapes	X			X
22	Hazelnuts	X			X
23	Hogs		X		X
24	Kidney Beans	X			
25	Lamb			X	
26	Lemons/Limes	X		X	
27	Lentils	X			X
28	Macadamia Nuts	X			X
29	Millet				X
30	Mustard Seed				X
31	Navy Beans	X			
32	Oats				X
33	Onions			X	
34	Orange Juice	X		X	
35	Oranges, Fresh	X		X	
36	Peanut Butter	X			

Count	Commodity	2018		2019	
		FPDP	MFP	FPDP	MFP
37	Peanuts				X
38	Pears	X		X	
39	Peas	X			X
40	Pecans	X			X
41	Pistachios	X			X
42	Plums/Prunes	X		X	
43	Pork	X		X	
44	Potatoes	X		X	
45	Poultry			X	
46	Processed Foods			X	
47	Raisins			X	
48	Rapeseed				X
49	Rice	X			X
50	Rye				X
51	Safflower				X
52	Sesame Seed				X
53	Sorghum		X		X
54	Soybeans		X		X
55	Strawberries	X		X	
56	Sunflower Seed				X
57	Sweet Corn	X		X	
58	Triticale				X
59	Walnuts	X			X
60	Wheat		X		X

Exhibit B: Participants in ATP Under the 2018 and 2019 Trade Mitigation Packages

The table below presents the 59 participant organizations in ATP under the trade mitigation packages of 2018 and 2019.[29]

Count	Participant	2018	2019
1	American Hardwood Export Council, APA—The Engineered Wood Association, Softwood Export Council, Southern Forest Products Association	X	X
2	Alaska Seafood Marketing Institute	X	X
3	Almond Board of California	X	X
4	American Peanut Council	X	X
5	American Pistachio Growers	X	X
6	American Seed Trade Association	X	
7	American Sheep Industry Association		X
8	American Soybean Association	X	X
9	Blue Diamond Growers	X	X
10	Brewers Association, Inc.	X	X
11	California Agricultural Export Council	X	X
12	California Cherry Marketing and Research Board	X	X
13	California Fresh Fruit Association	X	X
14	California Olive Committee	X	X
15	California Pear Advisory Board	X	
16	California Prune Board	X	X
17	California Strawberry Commission	X	X
18	California Table Grape Commission	X	X
19	California Walnut Commission	X	X
20	Cal-Pure Produce Inc.	X	X
21	Cotton Council International	X	X
22	Cranberry Marketing Committee	X	X
23	Distilled Spirits Council	X	X
24	Florida Department of Citrus	X	
25	Food Export Association of the Midwest USA	X	X
26	Food Export USA Northeast	X	X
27	Ginseng Board of Wisconsin	X	X
28	Intertribal Agriculture Council	X	

[29] Exhibit based on information published by USDA. USDA FAS, *ATP Funding Allocations* (Mar. 2, 2020), https://www.fas.usda.gov/atp-funding-allocations.

Count	Participant	2018	2019
29	National Association of State Departments of Agriculture	X	X
30	National Confectioners Association	X	X
31	National Potato Promotion Board	X	X
32	National Renderers Association	X	X
33	National Watermelon Promotion Board	X	
34	New York Wine and Grape Foundation	X	
35	Northwest Wine Promotion Coalition	X	X
36	Organic Trade Association	X	X
37	Pear Bureau Northwest	X	X
38	Pet Food Institute	X	
39	Raisin Administrative Committee	X	X
40	Southern United States Trade Association	X	
41	Sunkist Growers, Inc.	X	
42	The Popcorn Board	X	
43	U.S. Apple Export Council	X	X
44	U.S. Dairy Export Council	X	X
45	U.S. Dry Bean Council	X	X
46	U.S. Grains Council	X	X
47	U.S. Hide, Skin and Leather Association	X	X
48	U.S. Highbush Blueberry Council	X	X
49	U.S. Livestock Genetics Export, Inc.		X
50	U.S. Meat Export Federation	X	X
51	U.S. Pecan Growers Council	X	
52	U.S. Wheat Associates	X	X
53	USA Dry Pea and Lentil Council	X	X
54	USA Poultry and Egg Export Council	X	X
55	USA Rice Federation/US Rice Producers Association	X	X
56	Washington Apple Commission	X	X
57	Washington State Fruit Commission	X	X
58	Western United States Agricultural Trade Association	X	X
59	Wine Institute	X	X

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