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March 31, 2021

Hon. Bruce Summers, Administrator  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

#### Re: USDA Food Purchase Programs

Dear Mr. Administrator:

Thank you for the opportunity to comment on the development, coordination and implementation of a food purchase and distribution program intended to provide additional aid to nonprofits serving Americans in need of nutrition assistance. United Egg Producers (UEP) appreciates the Department of Agriculture's (USDA) proactive approach to soliciting input from the public on this vital effort.

UEP is a farmer-owned cooperative whose members independently market approximately 90 percent of all eggs produced in the United States. We support the Agricultural Marketing Service's (AMS) role in purchasing agricultural commodities, including eggs and egg products, for food and nutrition assistance. AMS staff do an outstanding job of communicating with our industry about purchase-related issues.

We offer the following points for your consideration:

1. If USDA continues the Farmers to Families Food Box Program or operates a similar initiative, **we request that eggs and egg products be recognized as fulfilling protein requirements in food boxes or other delivery platforms.** Previous round of the food box program failed to provide incentives for the inclusion of eggs and egg products because they did not replace the requirement for a certain poundage of meat, but only contributed to the box weight total requirement. Instead, USDA should follow precedents in the National School Lunch Program and several other programs that recognize eggs as a "meat alternate," allowing them to substitute for meat items.



Council Representative

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2. In implementing numerous legal authorities provided under recent legislation, including the American Rescue Plan Act, **USDA should devote funds to the equipment needs of food banks and pantries**, including refrigerated storage and transportation. This will make it easier for low-income families to receive popular items like eggs in a safe manner.
3. **USDA should increase the proportion of eggs and egg products in any future purchase programs.** In mandating additional commodity purchases and donations, the American Rescue Plan Act specifically singles out eggs, along with a small number of other commodities, as required for purchase. We respectfully urge AMS to recognize this direction from Congress and seek opportunities for additional egg purchases. Eggs are popular with program participants, providing a versatile, nutrient-dense food that is well-suited to all age groups.
4. In all of these programs, we encourage USDA to **include value-added egg products, such as hard-cooked eggs packaged for single-family use.** We are aware that AMS is developing a purchase specification for hard-cooked eggs, and strongly commend the agency for its proactive and cooperative work in this area.

Thank you for your consideration of these views. We look forward to continuing to work with USDA to encourage better nutrition for all Americans.

Sincerely,

Chad Gregory  
President and CEO