



The Honorable Brooke Rollins
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

January 27, 2026

Via Electronic Submission to www.regulations.gov

Dear Secretary Rollins:

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On behalf of AmericanHort, thank you for the opportunity to submit comments to the Federal Register on the U.S. Department of Agriculture's (USDA) final rule, *Expanding Access to Risk Protection (EARP)* (90 FR 54523, Docket ID FCIC-25-0068). AmericanHort is the leading national trade association for the horticulture industry, representing 20,000 members and their affiliated businesses across the country. Our diverse membership includes greenhouse and nursery growers, breeders, garden retailers, interior and exterior landscape professionals, florists, educators, and suppliers. Collectively, our industry generates over \$500 billion in annual economic impact and supports approximately three million U.S. jobs, which depend on sound public policy and strong collaboration with federal leaders.

AmericanHort commends the Federal Crop Insurance Corporation (FCIC) and the United States Department of Agriculture (USDA) under Secretary Rollins' leadership for taking meaningful steps to modernize the Federal Crop Insurance Program and make it more accessible to specialty crop producers. In particular, we appreciate the agency's efforts to reduce administrative barriers, expand benefits for beginning farmers, and recognize evolving production and marketing practices within specialty agriculture. These changes represent important progress toward a more inclusive and responsive risk-management framework.

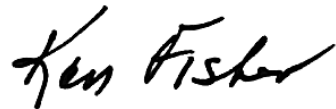
We are especially encouraged by FCIC's willingness to reassess longstanding limitations that have restricted participation by specialty crop growers, including removing barriers to direct-to-consumer marketing and increasing the use of special provisions to better reflect regional and crop-specific realities. These actions signal a growing recognition that specialty crop operations often differ significantly from traditional commodity systems and require tailored approaches to risk management.

While the final rule does not yet extend federal crop insurance coverage to all ornamental horticulture crops, AmericanHort views this rulemaking as an important step in the right direction. The ornamental horticulture industry is highly diverse, includes a significant number of beginning and small-scale growers, and relies heavily on direct and local marketing channels. As climate variability, extreme weather events, and market disruptions continue to intensify, the lack of accessible federal risk-management tools remains a significant challenge for our members.

AmericanHort looks forward to continued engagement with USDA, FCIC, and the Risk Management Agency to explore opportunities for improving existing programs like the Nursery Select Program. We also look forward to collaborating on the development of new pilot programs, alternative risk-management tools, or other pathways that would allow nursery, greenhouse, and floriculture growers to meaningfully participate in the Federal Crop Insurance Program in the future. We stand ready to work collaboratively with the agency to provide industry data, technical expertise, and stakeholder input to support this effort.

Thank you for your consideration and for your continued commitment to strengthening risk-management options for all segments of U.S. agriculture.

Sincerely,

A handwritten signature in black ink that reads "Ken Fisher". The signature is written in a cursive, flowing style with a large initial "K" and "F".

Ken Fisher
President & CEO
AmericanHort