

AG ISSUES UPDATE

Edited by Sara Hricko

May 2021

USApple Updates

White House Official Meets with Board and YALs

At its monthly online meeting on April 21, the Board of Directors heard from special guest Will McIntee, President Biden's associate director for public engagement. McIntee is the point person on agriculture and rural issues in that White House office. Previously he was the National Rural Affairs Coordinator in the Biden for President campaign. Topics of discussion included the USDA food box program, apple exports, and the goal of bringing broadband internet access to rural areas. The 2021 class of Young Apple Leaders also participated.

USApple April 2021 Storage Report – Movement Accelerates by 15 Percent

As reported in the April 2021 edition of Market News, total U.S. apple holdings were 81.7 million bushels -- a decrease of 8.6 percent or 7.1 million bushels compared to April 2020 storage levels.

Fresh apple holdings declined by 12.8 percent compared to the same month last year. Processing apple holdings were 2.1 percent greater than April 2020 values. Movement of both fresh and processing apples accelerated from March to April (20.4 m bu) compared to February to March values (17.7 m bu). The month over month change in fresh holdings was 19 percent greater than the movement from February to March. Similarly, processing apple movement from March to April was 7 percent greater compared to the previous figure.

Stocks of fresh Red Delicious and Gala are significantly less than they were at the same point last year with 2.1 million fewer bushels (-15 percent) and 2.7 million fewer bushels (-22 percent) respectively. Conversely, fresh Cosmic Crisp stocks were almost 581,000 bushels in April -- the first time that variety has recorded storages so late in the season.

You can access the full report here: <https://usapple.org/wp-content/uploads/2021/04/Market-News-2021-4.pdf>

Idaho Apple Leaders Urge Senate Action on Agricultural Labor Reform

On April 20, the Idaho Press published an op-ed authored by USApple board member Daniel Rowley and former USApple chairman Kelly Henggeler. The piece calls on the Senate to take up agricultural labor reform building on the work done by the House with passage of the Farm Workforce Modernization Act (FWMA). Idaho's congressional delegation has played an active role in this debate as Congressman Mike Simpson (R-Idaho) was one of the primary authors of the FWMA and Senator Mike Crapo (R-Idaho) is now working with Senator Mike Bennett (D-Colo.) to craft a bill in the Senate.

USApple worked with Rowley and Henggeler in drafting the article and getting it placed in the newspaper. As we work to build momentum and get this important effort over the finish line it will be critical that Senators hear directly from their constituents -- the voters in their state. With that in mind, please watch your inbox for calls to action. For information on engaging congressional members, contact Diane Kurre. Or if you are interested in writing an op-ed or letter to the editor, contact Tracy Grondine.

Farm Bureau updates

USDA Reopens, Expands COVID-19 Aid to Agriculture

The U.S. Department of Agriculture is putting at least \$6.5 billion into new and/or expanded programs to help farmers recover from continued fallout of the COVID-19 pandemic while continuing to make payments through previously established aid programs.

The agency's signature pandemic assistance program for farmers, the Coronavirus Food Assistance Program (or CFAP), was reopened and incorporated into the new, \$12 billion USDA Pandemic Assistance for Producers initiative. The expanded program aims to fill gaps that USDA said it identified in previous aid programs and reach more producers affected by the pandemic.

The CFAP program, which offers direct payments to help eligible producers of certain commodities offset losses caused by the pandemic, was on hold as part of a government-wide review by President Joe Biden's administration of regulatory action taken toward the end of former President Donald Trump's administration. While USDA continued to accept applications, payment and application processing were temporarily suspended.

USDA has reopened for at least 60 days the window for producers to apply for the second round of CFAP in an effort to target underserved producers and others who may not have applied yet for the program. At the same time, USDA will resume processing applications and payments related to the expanded CFAP aid enacted in December. That includes:

- Additional payments to cattle producers who applied for the first round of CFAP and for producers of certain non-specialty crops who applied for the second round of CFAP. (Eligible producers will be paid without need to re-apply).
- Opportunities for pullet and turfgrass sod producers (who were not previously eligible) to apply for aid.
- Opportunities for producers to modify existing applications to take advantage of updated payment calculations related to crop insurance and indemnity and disaster assistance programs.

Processing of additional payments to swine producers and applications from contract growers (who were also made eligible in December) remain on hold as USDA reviews those programs. However, producers may continue to apply.

In addition to reopening CFAP and resuming most processing, USDA is allocating at least \$6 billion to create new programs or expand current ones to provide assistance in the following areas:

- Dairy farmers (through the Dairy Donation Program or other means)
- Producers who had to euthanized livestock and/or poultry
- Biofuels
- Specialty crops, beginning farmers, local, urban and organic farms
- Costs associated with organic certification or conservation activities
- Other potential expansions of CFAP
- Timber harvesting and hauling
- Personal Protective Equipment and other protective measures for food and farm workers

- Efforts to improve the resiliency of the food supply chain (including assistance to meat and poultry operations to facilitate interstate shipment)
- Infrastructure to support donation and distribution of perishable commodities
- Efforts to reduce food waste

USDA is also allocating an additional \$500 million to a variety of programs that support agriculture through research; commodity marketing; assistance for socially disadvantaged, veteran, and beginning producers; animal disease assistance and response; and more.

Paycheck Protection Program Deadline Extended

Farms and other small businesses affected by the continued economic effects of the COVID-19 pandemic will have an additional two months to apply for relief loans through the U.S. Small Business Administration's Paycheck Protection Program.

Congress passed legislation last month extending until May 31 the window to apply for the program, which had been set to close at the end of March. President Joe Biden signed the measure into law. The program offers forgivable loans to small businesses, including farms, that have been affected by the COVID-19 pandemic so they can continue to pay employees and cover certain other expenses.

Participants can apply for the loans through eligible lenders.

Farm Bureau supported extending the deadline to apply and continues to advocate for additional improvements to make it easier for farmers to access the program. Several changes have been made to expand farmer eligibility since the program was first introduced in spring 2020, including a recent change to allow using the gross receipts test to determine eligibility for single-member limited liability corporations and qualified joint ventures. The deadline extension will give newly eligible farms and businesses more time to apply.

Learn more about the program at www.sba.gov/funding-programs/loans/covid-19-relief-options/paycheck-protection-program.

Funding for Agriculture, Nutrition Included in Federal Stimulus Package

Programs to help agriculture and the food supply chain recover from the continued fallout of the COVID-19 pandemic will get a boost through the \$1.9 trillion stimulus plan passed by Congress and signed by President Joe Biden in March.

The American Rescue Plan Act of 2021 allocates about \$10.4 billion for efforts to strengthen agriculture and the food supply chain. That includes a combined \$3.6 billion for food purchases to be distributed to families in need, similar to the Farmers to Families Food Box program, and for farms and food processors to purchase protective equipment and implement other COVID-19 mitigation measures to protect employees.

In addition to funding for food purchases and COVID-19 mitigation costs, the package includes funding to monitor animals for the virus that causes COVID-19 and provides \$100 million in relief to federally inspected small and very small meat, poultry and egg processors to help reduce overtime inspection costs as they work through a processing backlog.

Other provisions include:

- Grants to improve rural health care and assist COVID-19 vaccination efforts in rural communities.
- Debt relief to assist socially disadvantaged farmers as well as additional assistance to support socially disadvantaged farmers, including training, education, technical assistance, grants and loans.
- Funding to purchase U.S. food for international humanitarian efforts.
- Bolstering nutrition programs to assist families in need.

The agriculture and nutrition provision are part of a larger COVID-19 response and stimulus package that also includes direct payments to individuals and families up to certain income limits, expanded unemployment payments and other relief.

Apply Now for Direct Payments

Missed your chance to apply for the U.S. Department of Agriculture's signature COVID-19 assistance program for farmers? Another opportunity to apply for the CFAP 2 program, which offers direct payments to eligible producers, is now available.

Payments are limited to \$250,000 per person or entity, with some exceptions for corporations, limited liability companies, or limited partnerships in which members actively provide labor or management. There is an Adjusted Gross Income limit of \$900,000, except for producers who make at least 75 percent of their income from farming. Applicants must also meet conservation compliance provisions. The following commodities are eligible for the CFAP 2 program. Visit www.farmers.gov/cfap for more details on payments.

- Row crops: alfalfa, amaranth grain, barley, buckwheat, canola, corn, Extra Long Staple (ELS) cotton, upland cotton, crambe (colewort), einkorn, emmer, flax, guar, hemp, indigo, industrial rice, kenaf, khorasan, millet, mustard, oats, peanuts, quinoa, rapeseed, rice, sweet rice, wild rice, rye, safflower, sesame, sorghum, soybeans, speltz, sugar beets, sugarcane, sunflowers, teff, triticale, and all classes of wheat.
- Dairy: Cow and goat milk are both eligible.
- Broilers, eggs and pullets
- Livestock: beef cattle, hogs and pigs, and lambs and sheep. (Contract growers can continue to apply; however, application processing and payments are on hold as USDA reviews this aspect of the program.)
- Specialty crops: More than 230 fruit, vegetable, horticulture and tree nut crops as well as honey, maple sap and indigo.
- Wool
- Specialty livestock: alpacas, bison, buffalo, beefalo, deer, ducks, elk, emus, geese, goats, guinea pigs, llamas, mink (including pelts), mohair, ostrich, pheasants, quail, rabbits, reindeer, and turkey.
- Floriculture and nursery crops
- Aquaculture
- Tobacco

Certain commodities are not eligible for the program, including:

- Hay, except alfalfa, and crops intended for grazing.
- All equine, breeding stock, companion or comfort animals, pets, and animals raised for hunting or game purposes.
- Birdsfoot and trefoil, clover, cover crop, fallow, forage soybeans, forage sorghum, gardens (commercial and home), grass, kochia (prostrata), lespedeza, milkweed, mixed forage, pelts (excluding mink), perennial peanuts, pollinators, sunn hemp, vetch, and seed of ineligible crops.

Apply online or through your USDA Service Center. You can also contact USDA at 877.508.8364. If you applied for the first CFAP program, the application process will be easier for the second round because USDA likely has many of your documents already on file.

Learn more by visiting www.farmers.gov/cfap.

Farmers, Farmworkers Get Protected from COVID-19 as Vaccines Become Available.

All Pennsylvania adults are now eligible to make appointments to receive the coronavirus vaccine and agriculture leaders are encouraging farmers and farmworkers to sign up to protect themselves, their communities, and Pennsylvania agriculture sector.

Pennsylvania Farm Bureau is maintaining information about the vaccine, including how and where to find appointments, on its website: www.pfb.com/vaccine.

All Pennsylvania residents age 16 or older became eligible for the vaccine April 13; however, farmers along with workers in agriculture and throughout the food supply chain, have been able to make vaccination appointments since the end of March. Farm Bureau supported food and agriculture workers receiving priority access to the vaccine.

The choice to get vaccinated against COVID-19 is voluntary and not a mandate. But health care and public health officials have stressed that widespread vaccination will be essential to curbing the spread of virus, preventing further deaths and hospitalizations and leading to the lifting of restrictions and reopening of Pennsylvania's economy. For agriculture, widespread vaccination is crucial to ensuring that the food supply chain and the industry is not again disrupted by outbreaks of COVID-19.

Still learning about the vaccine or want to know where you can sign up? Here's some important information to know:

How do vaccinations help stop the COVID-19 pandemic?

Experts say that getting vaccinated protects you by significantly reducing the likelihood that you will become infected with COVID-19 and reducing even more the chance that you will have a severe case that results in significant complications or death. It protects those around you by reducing the chance you will spread the virus. As more people are vaccinated, we will build herd immunity, preventing the virus from spreading in the community.

Who is eligible for the vaccine?

All Pennsylvanians age 16 or older.

Where can I get vaccinated?

Vaccinations are available from numerous community providers, including pharmacies, urgent care centers and hospitals, doctor's offices, and mass vaccination sites that have been set up in some counties.

A map of vaccine providers maintained by the Pennsylvania Department of Health can be accessed at www.pfb.com/vaccine. Those without internet access can call the Health Hotline at **1.877.PA.HEALTH (1.877.724.3258)**. You can also check with your county government or health systems in your region to learn if there are any mass vaccination sites near you.

What vaccines are available?

Three vaccines have been approved for Emergency Use Authorization, which allows medical products that have not gone through full Food and Drug Administration approval to be used in response to a public health emergency. As of mid-April, use of one of those three, the Johnson & Johnson vaccine, had been temporarily paused while public health officials evaluate the vaccine further.

The Pfizer-BioNTech and Moderna vaccines are approved for people age 16 and older and 18 and older respectively and are delivered in two doses spaced several weeks to a month apart. The Johnson & Johnson was approved for those age 18 and older and is delivered in a single dose.

Are the vaccines safe?

In order to apply for and receive such authorization, vaccine manufacturers must demonstrate that they have studied and collected the required amount of data on the safety of the vaccine, a requirement that all three have met.

As with other vaccines, people who get the COVID-19 vaccine may experience some side effects as a result of their bodies building protection. The most common are sore arm, fatigue, headache, chills and fever and should go away in a few days.

Do the vaccines work?

All three vaccines are considered effective at significantly reducing COVID-19 infections and reducing the likelihood of serious cases.

Pfizer-BioNTech and Moderna have been found in clinical trials to have efficacy rates of 95 percent and 94.5 percent respectively when delivered in two doses. Efficacy rate refers to the percentage by which the disease is reduced in a vaccinated population versus an unvaccinated population in a clinical trial. So a 95 percent efficacy rate means that there were 95 percent fewer new cases of COVID-19 in the vaccinated group compared with the unvaccinated group.

The Johnson & Johnson vaccine was tested using a different type of trial and under different circumstances making it difficult to compare to the other two. It was found to be 66 percent effective at preventing moderate to severe cases of COVID-19 after one month but had 100 percent efficacy against hospitalizations and death.

How were the vaccines made available so soon?

While the vaccines made it through their final phase of trials in record time, the effort benefited from a concentrated, global focus on quickly developing the vaccine accompanied by major public and private investments. In addition, scientific advancements enabled researchers to identify the strain of the virus early in the pandemic and the new messenger RNA technology that the Pfizer-BioNTech and Moderna vaccines rely on had been in development for years as researchers sought to combat other types of coronaviruses.

Do I still need to wear a mask and follow social distancing guidelines after getting vaccinated?

Public health experts recommend that vaccinated people continue to follow COVID-19 mitigation protocols when out in public as research is ongoing about the degree to which the vaccines prevent recipients from spreading the coronavirus.

Where can I learn more about the vaccines?

- **Centers for Disease Control:** www.cdc.gov/coronavirus/2019-ncov/vaccines/index.html
- **Pa. Department of Health:** www.health.pa.gov/topics/disease/coronavirus/Vaccine/Pages/Vaccine.aspx
- Your family doctor or health system

Tax Plans Would Threaten Family Farms

Farm Bureau is opposing plans in Congress that would tax unrealized capital gains at death and eliminate the stepped-up basis on those capital gains, warning the move could force many family farms out of business.

Enacting those changes would result in a significant tax burden for agriculture, putting at risk the ability of family farms to remain financially sustainable as they continue to the next generation.

Stepped-up basis enables farms to reduce the burden of capital gains taxes by resetting the value of an asset when it is transferred between generations. It's especially important in agriculture because assets, such as land, are often held for decades and passed on from generation to generation.

Currently, the capital gains taxes on the stepped-up value of an inherited asset are deferred until that asset is sold. So, if capital gains are taxed at death and the stepped-up basis is removed, the next generation inheriting the farm could be forced to pay taxes on the increase in value over generations.

In Pennsylvania, the average cropland value has increased 168 percent since 1997, resulting in an estimated capital gains tax of \$890 per acre. In that scenario, the capital gains tax would be close to 10 times the average cash rental rate.

Make your voice heard!

Members of Congress need to hear from the farmers they represent how taxing capital gains at death and eliminating the stepped-up basis would be devastating to the future of Pennsylvania's family farms. Make your voice heard by responding to PFB's Action Alert at www.pfb.com/ActNow

Free Equipment, Assistance Available for Farm Markets to Accept SNAP

Pennsylvania farmers who sell their products direct to consumers through farmers markets or their own retail stores can expand their markets and help address food insecurity by taking advantage of free assistance and equipment to start accepting payments using Supplemental Nutrition Assistance Program (SNAP) benefits.

Department of Human Services recently received a U.S. Department of Agriculture grant to help more farms with retail operations get started accepting SNAP. The grant covers free wireless, EBT-processing equipment (which is needed to accept SNAP benefits), set-up costs, and one-year of transactions fees. SNAP assists more than 1.8 million Pennsylvanians through a monthly payment based on income and household size, which can be used to purchase eligible produce and groceries. For farmers, accepting SNAP is the same as accepting debit or credit transactions. SNAP benefits cover the full price for a product that any other consumer would pay.

Fewer than 5 percent of farmers markets and on-farm markets are currently registered to accept SNAP. Interested farm retailers or market owners should apply to accept SNAP through USDA's Food and Nutrition Service. Once approved, free equipment can be obtained by contacting Pennsylvania's EBT processing vendor, Conduent, at 888.736.6328.

Agritourism Liability Bill Advances in State Senate

A bill that would limit civil liability for farms that invite the public onto their property for agritourism activities is a step closer to becoming law.

The Senate Agriculture and Rural Affairs Committee voted unanimously in March to send House Bill 101 to the full Senate for consideration. The bill cleared the state House of Representatives with a bipartisan vote in February.

The bill, sponsored by Rep. Barb Gleim of Cumberland County, would offer commonsense legal protection to farms that invite the public onto their property for agritourism activities, such as corn mazes, pick-your-own produce, hayrides, and similar attractions. Specifically, the bill would grant farms that offer agritourism activities reasonable protection from lawsuits that arise from circumstances beyond their control as long as they warn visitors of the inherent risks of being on a farm. At the same time, farmers would still need to take steps to ensure guest safety.

The bill is modeled off similar laws already on the books in at least 20 other states, including New York and Ohio.

Reforming civil liability for agritourism has been a longtime priority for Pennsylvania Farm Bureau and other agriculture organizations. The measure passed the state House last fall with a bipartisan vote. The Senate then passed the legislation as part of a separate bill related to COVID-19 but that measure was ultimately vetoed by Gov. Tom Wolf. Wolf cited concerns about the COVID-19 measure as the reason for his veto and did not signal any objection to the agritourism bill.

Wedding Barn Bill Passed by Senate

A bill that aims to make it easier for farmers to rent out barns for weddings and similar social events has been passed by the state Senate.

Senators voted 28-19 in favor of Senate Bill 191, sponsored by Sen. Judy Ward of Blair County. The measure now heads to the House for consideration.

The bill would exempt certain agricultural buildings that are used occasionally for weddings or other social events from some parts of the Uniform Construction Code, as long as other safety conditions are met. The exemption would apply only to existing structures, not new construction.

With more people wanting to connect with agriculture and hold events in rustic settings, wedding barns can be a great option for farms to diversify and bring in additional revenue to supplement farm income.

However, some municipal governments have required farms that want to host events to retrofit historic barns and agricultural buildings to meet the entirety of the construction code, which can be cost prohibitive, especially if a sprinkler system is required.

The legislation would allow farms to avoid having to install a sprinkler system in existing buildings if they meet certain safety requirements. Those include: ensuring electrical wiring is up to date, ensuring there are sufficient and operational smoke detectors and portable fire extinguishers on site, prohibiting smoking and open flames (except for food-warming trays), and ensuring there are multiple ways to exit the building safely in an emergency.

The bill is based on agreements that some farmers have reached with local officials in their municipalities and would establish a statewide standard that makes it easier for farms throughout the commonwealth to host events safely.

Ag Law updates

Brook Duer—Staff Attorney

Audry Thompson—Research Assistant

COVID-19: White House Reviewing OSHA’s Long-Delayed Emergency Temporary Standard

On April 26, 2021, according to the U.S. Department of Labor (DOL), Occupational Safety and Health Administration (OSHA), it submitted to the White House an Emergency Temporary Standard (ETS) for the prevention of workplace COVID-19 transmission to the White House. President Biden’s January 21, 2021 Executive Order on Protecting Worker Health and Safety directed DOL OSHA to decide upon the necessity of an ETS and submit to the White House by March 15, 2021 but that action was long-delayed without official explanation. An ETS on this topic would represent the first mandatory federal government workplace requirements specifically addressing COVID-19 transmission since the onset of the pandemic in 2020. The draft standard is presently under review by the Office of Management and Budget Office of Information and Regulatory Affairs for publication. OSHA emergency temporary standards are only authorized by law to be effective for six months and, when issued, this will be the first ETS issued since 1983. The legal authority for OSHA to dispense the formal regulation promulgation process requires a showing that “workers are in grave danger due to exposure to toxic substances or agents determined to be toxic or physically harmful or to new hazards.” This predicate legal justification may make it difficult to overcome a legal challenge to a COVID-19 ETS because the workplace risk has existed for over one year without OSHA action and vaccination rates are increasing. On April 27, 2021, the Congressional Research Service published a comprehensive report titled *Occupational Safety and Health Administration (OSHA): Emergency Temporary Standards (ETS) and COVID-19*.

Pesticides/Herbicides: Ninth Circuit Directs EPA to Ban Chlorpyrifos Use Entirely or Determine Food Residue Tolerance That Will Cause No Harm Within Sixty Days

On April 29, 2021, the United States Circuit Court of Appeals for the Ninth Circuit issued a decision on multiple petitions for review of U.S. Environmental Protection Agency (EPA) actions over the last several years regarding chlorpyrifos. Firstly, the Court vacated 2017 and 2019 EPA orders denying a 2007 petition to prohibit any chlorpyrifos residue tolerance in food under the Federal, Food, Drug and

Cosmetic Act (FFDCA), effectively banning it. The Court remanded the matter and ordered EPA within 60 days to either modify chlorpyrifos tolerances to that which EPA could determine to be safe or prohibit any chlorpyrifos tolerance. Lastly, the Court ordered EPA to similarly either modify or cancel Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) registrations for food use. The Ninth Circuit stated, “In short, the EPA has spent more than a decade assembling a record of chlorpyrifos’s ill effects and has repeatedly determined, based on that record, that it cannot conclude, to the statutorily required standard of reasonable certainty, that the present tolerances are causing no harm. Yet, rather than ban the pesticide or reduce the tolerances to levels that the EPA *can* find are reasonably certain to cause no harm, the EPA has sought to evade, through one delaying tactic after another, its plain statutory duties.” The Court later stated, “While the Dissent effectively views this as a “tight deadline,” it agrees that the “EPA dithered far too long.” The EPA has had nearly 14 years to publish a legally sufficient response to the 2007 Petition. During that time, the EPA’s egregious delay exposed a generation of American children to unsafe levels of chlorpyrifos. By remanding back to the EPA one last time, rather than compelling the immediate revocation of all chlorpyrifos tolerances, the Court is itself being more than tolerant. But the EPA’s time is now up.”

USDA Transition: Recently Moved Research Headquarters To Remain in Kansas City

On April 26, 2021, at the North American Agricultural Journalists annual meeting, USDA Secretary Vilsack stated that the headquarters of USDA’s Economic Research Service (ERS) and National Institute of Food and Agriculture (NIFA) would remain in Kansas City, MO, after the previous administration’s move of those offices from Washington, D.C. beginning in August 2018. Vilsack also stated, “I think you’ll see over time some of those positions that are currently not filled today will be filled in Kansas City, and some of those positions that aren’t filled today will be filled in the Washington, D.C., area.”

Pennsylvania Farm Bill: \$1 million 2021 Farm Vitality Grant Program Announced

On April 9, 2021, Pennsylvania Secretary of Agriculture Russel Redding announced the availability of \$1 million for the Farm Vitality Planning Grant program, which will provide \$7,500 grants to current and prospective farmers for the provision of professional services for farm planning. The grants can fund up to 75% of the costs to help develop plans for the management, expansion, and ownership transition or transfer of a farm. Applicants may use expenses incurred since July 1, 2020 as part of a work plan. Grant applications will be accepted beginning April 19, 2021 until funding is depleted.

Agricultural Finance: Economic Impact Report on Pennsylvania Agriculture Updated

On April 28, 2021, Pennsylvania Agriculture Secretary Redding announced the release of a report titled, “The Economic Impact of Agriculture in Pennsylvania: 2021 Update,” which updates the May 2018 report titled “Pennsylvania Agriculture: A look at the Economic Impact and Future Trends.” Both reports were produced by Econsult Solutions, Inc. and commissioned by Team Pennsylvania. The first incorporated data from the 2012 Agricultural Census and the update was able to incorporate the 2017 Agricultural Census results. Total direct economic output of all agricultural sectors totals \$81.5 billion. This represents a 2.7 percent decrease in total output from the estimate given in the 2018 report of

\$83.8 billion. This decrease is largely driven by a \$2.8 billion decrease in food manufacturing, which is substantial but caused by changes in the operations of individual large companies in Pennsylvania.