

November 22, 2019

The Honorable Kathy Castor
2052 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Garret Graves
2402 Rayburn House Office Building
Washington, D.C. 20515

Dear Chair Castor and Ranking Member Graves:

The Sustainable Food Policy Alliance (SFPA) and the National Association of State Departments of Agriculture (NASDA) are pleased to provide comments in response to the House Select Committee on the Climate Crisis's request for recommendations on policies, strategies and innovations necessary to reduce greenhouse gas emissions, maximize carbon storage, and enhance the climate resilience of farmers and ranchers.

Together, SFPA and NASDA represent key points in the food and agriculture supply chain, from farm gate to consumers' plates. Our joint comments underscore the importance of collaborating across the food and agriculture industry to achieve shared goals. Building a more resilient food system will require input and expertise from diverse public and private sector partners. No single segment can do it alone. We write now to offer our shared perspective on climate policy principles, and we look forward to continued engagement with all stakeholders on policy mechanisms and other initiatives that will support the work of the Select Committee.

Earlier this year, SFPA member companies Danone North America, Mars Incorporated, Nestlé USA and Unilever United States released a set of [climate policy principles](#) and urged the U.S. government to adopt policies that will significantly reduce greenhouse gas emissions across the economy, in addition to the efforts underway by SFPA's individual member companies to implement solutions to reduce their overall environmental footprints. Likewise, NASDA members recently adopted a [climate resiliency policy](#) that acknowledges the necessity of adapting to a changing climate to protect and enhance our nation's natural resources, while also building a resilient agricultural and food supply chain.

From individual farm businesses to the supply chains of food companies, all points in the food and agriculture value chain are already taking steps to address the volatility created by extreme weather and changing climate conditions. Strong U.S. government policy can complement and bolster those efforts by advancing sector-wide, scalable solutions to environmental challenges that account for the unique needs of individual farms and food businesses.

With that in mind, SFPA and NASDA offer the following points for consideration by the Select Committee.

Voluntary, incentive-based efforts, such as programs authorized through the Farm Bill and other policy vehicles, have an important role to play in helping farmers build resiliency, reduce greenhouse gas emissions, and sequester carbon. Many farmers and ranchers are already using management practices that help mitigate the impacts of extreme weather, enhance soil health, and store carbon on their operations.¹ Federal policies and programs can help promote adoption and awareness of such practices, increasing overall environmental benefits.

Enhancing voluntary, incentive-based programs will likely require additional resources for research, technical assistance, and development of financing models. Given the environmental benefits – including reduced emissions, carbon sequestration, and many others – dedicating such resources would be a wise investment.

Farmers and ranchers are already shouldering the burden and costs of adapting to increasingly severe and volatile weather. The financial and emotional stress is evident among agricultural businesses, especially during a weak farm economy. The right mix of incentives can help agricultural producers manage any short-term costs associated with adopting climate resilient practices.

The Regional Conservation Partnership Program and the soil health provisions in the 2018 Farm Bill provide an illustrative example of incentive structures designed to scale up impactful practices. Soil health improvements also represent an environmentally-friendly practice with the potential to yield additional economic returns to agricultural producers over time. Farmers have long-recognized the importance of soil health to their operations. More broadly, healthy soils help protect our nation’s water supply and deliver critical ecosystem services such as carbon sequestration. Considering these benefits, the 2018 Farm Bill designates soil health as a priority outcome for USDA conservation programs like the Conservation Stewardship Program. By integrating soil health into existing, voluntary conservation programs, the 2018 Farm Bill helps align incentives for farmers with federal policy goals.

Soil health improvements have the potential to increase the amount of carbon stored in agriculture and forestry land across the United States. Recognizing that all farms are different and that soil health tools and practices do not operate in isolation, Congress should support and incentivize a systems approach to soil health management, including supporting the expansion of the wide array of tools needed to incentivize and measure soil health improvements. Soil carbon levels can vary widely across landscapes, regions and time periods. Additionally, USDA should develop improved protocols for measuring soil carbon gains, since measuring soil carbon can be expensive and vary greatly. More accurate and practical measurements will enable better accounting of agriculture’s contribution to emissions reductions. In addition, it will lay the foundation for the development of carbon storage markets that could ultimately compensate farmers and ranchers for the ecosystem services they provide.

¹ Practices include no-till, cover cropping, and prescribed (or rotational) grazing. USDA currently publishes [National Conservation Practice Standards](#) for these practices and many others.

Additional research and forecasting tools should be supported to help the food and agriculture system predict and adapt to the effects of a changing climate, including increased pests and disease, changes in suitable cropping systems, and increases in extreme weather events. SFPA and NASDA encourage Congress to develop policy and other mechanisms that better identify and address gaps in existing research; support the development of a coordinated research strategy across the federal government; and encourage the development of new or expanded public-private research partnerships.

Leveraging partnerships with the private sector and non-profits can support scale. Federal programs and policies should seek to encourage partnerships between public and private stakeholders, including agricultural producers, federal, state and local governments, private companies, non-profit organizations and local communities.² Congress should explore all available opportunities to leverage private investment, identify new conservation models, and maximize the value and effectiveness of federal incentives and technical assistance.

A predictable approach to policy and regulation remains critical. Policies focused on climate adaptation and mitigation at all levels, from local to federal, should be consistent and complementary.

We appreciate the opportunity to provide our perspective and are pleased to serve as a resource to the Select Committee moving forward. Please contact info@foodpolicyalliance.org or Max Moncaster (max.moncaster@nasda.org) with questions. SFPA and NASDA look forward to your continued work in this area and stand ready to work with Congress, the Administration and stakeholders across the food and agriculture value chain to find U.S.-based solutions to our share of this global threat.

Sincerely,



Sustainable Food Policy Alliance



National Association of
State Departments of Agriculture

² USDA's [Regional Conservation Partnership Program](#) represents one impactful model that encourages collaboration between public and private entities.