



RURAL ADVANCEMENT FOUNDATION INTERNATIONAL - USA

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Mr. Seth Meyer, Chief Economist
Office of the Chief Economist, USDA
1400 Independence Ave, SW
Washington, DC 20250

Re: Comments on the Executive Order on Tackling the Climate Crisis at Home and Abroad; Docket No. USDA-2021-0003-0001

The Rural Advancement Foundation International - USA (RAFI-USA) is a nonprofit organization which challenges the root causes of unjust food systems, supporting and advocating for economically, racially, and ecologically just farm communities. We envision a thriving, sustainable, and equitable food system: where farmers and farmworkers have dignity and agency; where they are supported by just agricultural policies; and where corporations and institutions are accountable to their community.

We work with many types of farmers at varying points in the development and operation of their businesses. In the course of that work we learn about what factors in the current system are either contributing to the success of their farm business, or making it harder for them to make a living. Through farm advocacy, we witness and learn from the experience of farmers in financial crisis. Through our Farmers of Color Network program we witness the unique challenges faced by farmers of color, and the barriers faced by small to mid-scale sustainable growers. Through our farmer seed cooperative we see the necessity and benefit of farmer-led research, public plant breeding, and regionally adapted varieties bred for sustainable production. When we see similar conditions impacting multiple farmers, they can usually be traced back to policies or practices that create or intensify those conditions.

As the Biden administration seeks input on USDA's climate policy, we urge you to keep the following in mind:

Decades of USDA policy and lax antitrust enforcement have led to unchecked consolidation in agribusiness and massive farm loss, particularly among Black farmers and farmers of color. Industrial agriculture corporations increasingly control the inputs, infrastructure, and markets¹ that farmers depend on and have been slowly squeezing farmers out of business. In the case of contract

poultry growers, giant integrator companies have “exercised ... comprehensive control,” in the words of the Office of the Inspector General.² This consolidation has been welcomed by some in the name of consumer benefit in the form of lower prices, but has occurred at the expense of not only family farmers but also consumers and rural communities who experience environmental degradation, low wages, unsafe working conditions, a loss of local sovereignty of their food systems, and the devastating impacts of climate change.

The COVID-19 pandemic has illustrated the fragility of a food system built with a laser focus on scale and efficiency rather than resilience. As climate change continues to expose farmers and communities to disastrous weather events, we need a food system that is resilient: one with shorter supply chains, distributed and redundant processing, local ownership and control, and safety nets for those who work in the system to feed us all.

With the consolidation of farmland and agricultural industry so far advanced, any climate policy blind to this trend will ultimately perpetuate and reinforce it the same way most USDA programs have. Payment structures built on the business/production models of the largest farms will ensure that those programs are a poor fit and provide negligible support for mid-scale and small-scale farms. Because the average farm size for Black farm operators (according to the 2017 Ag Census) was 132 acres, compared to the national average of 441 acres, this is also a racial equity issue.

The Biden Administration and Secretary Vilsack’s USDA must prioritize local control and ownership, vigilant antitrust enforcement to stave off market consolidation, and programs which serve small and mid-sized farms — especially farmers of color — in its climate policy and programs.

Specific recommendations are listed below. We thank you for this opportunity to comment.

Climate-Smart Agriculture and Forestry

A. How should USDA utilize programs, funding and financing capacities, and other authorities, to encourage the voluntary adoption of climate-smart agricultural and forestry practices on working farms, ranches, and forest lands?

Conservation programs and alternative food systems market development are a crucial part of the infrastructure farmers need to contribute to climate change adaptation and mitigation. The Biden Administration and USDA should include the mandatory funding elements from the Agriculture Resilience Act, the Climate Stewardship Act, and the Justice for Black Farmers Act in the Administration’s Proposal for the American Jobs Act.

1. How can USDA leverage existing policies and programs to encourage voluntary adoption of agricultural practices that sequester carbon, reduce greenhouse gas emissions, and ensure resiliency to climate change?

Existing USDA voluntary conservation programs like the Environmental Quality Incentives Program (EQIP), the Conservation Stewardship Program, and the Conservation Reserve Program should be expanded with added emphasis on practices which improve soil health, reduce greenhouse gas emissions (not solely carbon), and build resilience to climate-change driven extreme weather. Livestock payments in EQIP should prioritize sustainably managed grazing practices, and disincentivize concentrated animal feeding operations (CAFOs).

Supporting organic agriculture as a core climate strategy supports climate mitigation, climate resilience, and farmer bottom lines. Specifically, USDA should increase support for the organic cost-share program, with priority given to farmers of color and limited resource farmers. USDA should:

- Increase reimbursement rates to \$1,000 annually per certification scope per operation.
- Streamline and simplify the reimbursement process, by having reimbursements go directly to organic certifiers to reduce certification fees, as opposed to reimbursing organic operations for the annual certification fees they pay to certifiers. This will result in a more-timely reduction in certification cost burdens to organic operations, and reduce paperwork burden on these operations.
- Expand the cost share program to address costs faced by farmers transitioning to organic, prior to full certification.

2. What new strategies should USDA explore to encourage voluntary adoption of climate-smart agriculture and forestry practices?

Any program which provides financial benefits for voluntary adoption of climate-smart practices should follow the following principles:

- Markets must be well regulated with strong, pre-emptive antitrust enforcement to prevent a handful of companies from dominating the market and dictating policy and prices.
- Programs must be structured in a way that is as beneficial for small farms as for large ones, in order for them to not drive further farm loss and farm consolidation
- Pollution does not respect property lines. Communities of color and low-wealth communities are already disproportionately impacted by industrial greenhouse gas emissions and other pollutants. A system which would allow companies to pay for the right to continue polluting in those communities would be racist and unacceptable.

D. What data, tools, and research are needed for USDA to effectively carry out climate-smart agriculture and forestry strategies?

USDA should bolster public plant and animal breeding efforts to address changing climates. Collectively, USDA's competitive grant research programs should invest \$100 million annually to significantly expand resources for public cultivar and animal breed development to ensure that farmers have access to seeds and breeds that are regionally adapted to changing climates and to optimize production using climate friendly farming systems.

The Administration should use the statutory authorities of the Hatch Act, Smith-Lever Act, and the Second Morrill Act, which authorize agricultural research and extension funding at the Nation's Land Grant Universities (LGUs) and State Experiment Stations, including 1890 Land Grant Institutions, to incentivize all LGUs to revitalize their public plant and animal breeding programs. The focus for this increased funding should be to ensure the farmers and ranchers of each state or region have access to regionally adapted cultivars and animal breeds that are ideally suited to their changing climates and to farming systems that are proven to be climate friendly. Similar incentives should be provided for the nation's Hispanic-Serving Agricultural Colleges and Universities (HSACUs) and Tribal Colleges.

RAFI-USA has worked with a cooperative of organic farmers, in partnership with public plant breeders, to develop seed varieties adapted for organic production in the Southeast, work which was funded through the Organic Agriculture Research and Extension Initiative (OREI). This kind of public cultivar development is crucial for maintaining the genetic diversity of climate-suitable publicly available seed, especially as regional climates change.

Farmers, not corporations, should own any data pertaining to or generated by their farm.

Environmental Justice and Disadvantaged Communities

A. How can USDA ensure that programs, funding and financing capacities, and other authorities used to advance climate-smart agriculture and forestry practices are available to all landowners, producers, and communities?

USDA should focus on supporting producers of color through grants rather than loans. Predatory lending has been a major driver of land loss for Black farmers and farmers of color. USDA is not a trusted agency by those farmers. Any program which offers financing rather than grants carries a risk for those farmers which they have to consider in the historic context of USDA's track record. In a recent survey of applicants for our Farmers of Color Network infrastructure grants, less than 15% of respondents had direct or guaranteed loans with FSA. Our infrastructure granting program is currently filling a need which should be filled by USDA, but isn't because of the lack of outreach and the lack of trust that exists.

Programs should be structured and implemented in a way that takes into account all ownership structures and land-use arrangements, including leasing, heirs property, and more.

B. How can USDA provide technical assistance, outreach, and other assistance necessary to ensure that all producers, landowners, and communities can participate in USDA programs, funding, and other authorities related to climate-smart agriculture and forestry practices?

USDA should work closely with community-based organizations who have existing relationships with farmers of color, like RAFI-USA, to provide technical assistance and outreach. Organizations receiving funding should have at least 3 years of documented evidence in providing agriculturally related education, training, or services to socially disadvantaged or veteran farmers and ranchers.

C. How can USDA ensure that programs, funding and financing capabilities, and other authorities related to climate-smart agriculture and forestry practices are implemented equitably?

Faith in USDA agencies cannot be restored, and programs will not be implemented equitably, until full accountability measures are implemented transparently. For example:

- All farmer visits and calls with USDA agencies like FSA and NRCS should result in a receipt for service.
- All agency staff who interact with producers or make decisions about funding/financing applications should have a discrimination review as part of their annual performance review, with information from receipts for service and data such as time-to-funding for all applications broken out by race/ethnicity, gender, and race/ethnicity/gender intersection.
- Commission and publish a report of the past 5 years of loan applications' time to funding, broken down by race, gender, and race/gender intersection.
- USDA should publish reports for all programs on percentage and amount of available funding or financing awarded, by race/ethnicity, gender, and farm size.

We appreciate your consideration of these recommendations and welcome the opportunity to answer any questions or provide additional information.

Sincerely,

Edna Rodriguez
Executive Director
Rural Advancement Foundation International - USA

¹ <https://www.americanprogress.org/issues/economy/reports/2019/05/07/469385/fair-deal-farmers/>

² https://www.sba.gov/sites/default/files/oig/SBA-OIG-Report-18-13_0.pdf