

November 1, 2021

The Honorable Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Re: Commodity Credit Corporation
[Docket ID: USDA–2021–0010]
Climate-Smart Agriculture and
Forestry Partnership Program

USDA: Reject Ag Offset Schemes

Dear Secretary Vilsack:

We have deep concerns with proposals to expand the use of climate-smart farming practices. While it is important to address the climate crisis, we have significant concerns with USDA's proposed approach to the climate crisis, which amounts to little more than a carbon offset scam. By creating a carbon bank through the Commodity Credit Corporation and driving new markets for ad-hoc production practices and agricultural waste, USDA will undermine efforts to ensure sustainable farming practices and healthy affordable food for consumers. Worse yet, these programs will prop up large industrial agriculture operations and factory farming, which harm public health and Black, Latino, Indigenous, Asian and white rural communities, and move us toward a system of carbon offsets that will delay the urgent need to transition off of fossil fuels.

We need real solutions to our unsustainable corporate agricultural systems

Rather than funding individual practices in a vacuum, incentives should promote widespread shifts to organic, regenerative, and agroecological farming systems. For example, simply encouraging farmers to practice no-till agriculture, which is dependent upon fossil-fuel derived herbicides like glyphosate, will not meaningfully reduce emissions or build healthy, resilient soil. Furthermore, USDA should pursue practices that phase out factory farming, which is a major source of agricultural greenhouse gas emissions, along with a major source of harmful air and water pollution.

Agricultural offsets are an ineffective policy for addressing the climate crisis

The contemplated carbon offset schemes allow utilities, fossil fuel companies and other polluters to continue releasing greenhouse gases, instead of actually reducing and eliminating their emissions. In addition, these schemes threaten to actually increase emissions, because fossil fuel based carbon extracted from where it has been sequestered underground for millions of years, safely trapped, cannot be "offset" by temporary actions in agriculture.

Methods for measuring soil carbon sequestration remain underdeveloped, inconsistent, and influenced by specific climates and geographies.¹ Considering the inherent uncertainties measuring these practices, framing offsets as “permanent” and “quantifiable,” perpetuates a myth that agriculture can sequester fossil carbon quickly and indefinitely.

Carbon offset programs will drive further consolidation of our food system

Market-based carbon credit programs give additional leverage to already powerful corporations, including agribusinesses, that have long squeezed farm income and drained rural economies.² Companies may continue to capture the majority of profits and valuable on-farm data at the expense of farmers.

Carbon credit programs will likely be most feasible for larger operations, potentially leaving out smaller farms and farmers of color — including Black and Indigenous farmers and Tribal Nations — who are already underserved by USDA programs and Commodity Credit Corporation payments. Furthermore, benefits of carbon payments would not extend to organic and other operations that have already invested in regenerative and/or agroecological practices.

Carbon credit programs and factory farm gas pollute environmental justice communities

Factory Farms are cashing in on offset scams by selling carbon credits into existing offset programs for factory farm gas, or methane they produce in manure digesters. Big Oil & Gas markets this methane as “Renewable Natural Gas,” touting it as a low or no carbon solution to the climate crisis. But burning factory farm gas and fossil fuels does not reflect the clean energy economy that America, especially rural and communities of color, need to stabilize our climate. Constructing pipelines through rural communities, expanding industrial dairy and hog operations, and increasing air and water pollution leads us further away from the future our communities deserve. This approach wrongly supposes that methane emissions from factory farms are a foregone conclusion, as well as ignoring the litany of co-pollutants from factory farms that are poisoning the air and water of nearby Black, Latino, Indigenous, Asian and white rural communities.

Offset programs are also increasing pollution in other sectors that purchase offsets as a way to justify continuing emissions. US states with carbon credit programs saw emissions of CO₂ and PM 2.5 increase in environmental justice communities, while emissions went down in more affluent communities.³ This is because industrial polluters and power plants are disproportionately located in environmental justice communities,

¹ U.S. Global Change Research Program. “Second State of the Carbon Cycle Report.” 2018 at 249 to 252.

² Institute for Agriculture and Trade Policy (IATP). “Why carbon markets won’t work for agriculture.” January 2020 at 2.

³ FWW. “Cap and Trade Hurts Environmental Justice.” December 2019 at 2.

simply allowing them to trade credits without taking steps to reduce and eliminate emissions.⁴

Building Back Better in agriculture builds healthier food systems and rural communities

USDA has necessary tools to build soil health, protect water quality, and avoid greenhouse gas emissions while boosting farm income. Instead of continuing the legacy of pollution through carbon markets and factory farm gas, we encourage policies that eliminate pollution at the source and support local food economies, better living wages for farmers and farmworkers, and pathways for sustainable practices of food and energy production.

USDA needs to transition away from factory farming and Big Ag by implementing conservation programs, and supporting farms in adopting regenerative practices that enhance soil health, protect biodiversity, and help make our food system more resilient to the climate crisis -- all without the use of counter-productive carbon pricing systems including offsets and banking. Black, Indigenous, Tribal, and family farmers and ranchers need structural reforms that ensure fair markets and prices, and infrastructure that supports transitions to and sustainable continuance of regenerative farming. Ecologically regenerative farming should be incentivized in addition to, and not instead of, carbon reductions in the energy and transportation sectors.

Sincerely,

Original Signatories

Family Farm Defenders
Food & Water Action

Greenpeace USA
Indigenous Environmental Network

Full List of Signatories

350 Butte County
350 Conejo / San Fernando Valley
350 Eugene
350 Hawaii
350 Seattle
350.org
350NYC
359 Triangle
Abundant Michigan Permaculture Ypsilanti
Aid Organization
Alaska Community Action on Toxics

Aliança RECOs - Redes de Cooperação
Comunitária Sem Fronteiras
Alternatives for Community & Environment
Animal Legal Defense Fund
Animals Are Sentient Beings, Inc.
Athens County's Future Action Network,
acfan.org
Biofuelwatch
Blue Ridge Environmental Defense League
Bold Alliance
Buffalo River Watershed Alliance

⁴ FWW. "Biogas From Factory Farm Waste Has No Place in a Clean Energy Future." July 2019 at 3.

Catskill Mountainkeeper
CCAG
Center for Biological Diversity
Center for Biological Diversity
Center for Common Ground
Center for Food Safety
Citizens to Save Our Earth
CleanAirNow
Climate Action Rhode Island – 350
Climate Justice Alliance
Coalition Against Pilgrim Pipeline - NJ
Coalition to Protect New York
Coming Clean
Dakota Rural Action
Des Moines County Farmers and Neighbors
for Optimal Health
Dogwood Alliance
Don't Gas the Meadowlands Coalition
Earth Action, Inc.
Extinction Rebellion San Francisco Bay Area
Farmworker Association of Florida
First Parish Watertown
FrackBusters NY
Franciscan Response to Fossil Fuels
Friends of the Earth
Global Justice Ecology Project
Grand(m)others Act to Save the Planet GASP
Gulf Coast Center for Law & Policy
ICRA (Iowa Citizens for Responsible
Agriculture)
Idle No More SF Bay
Indigenous Environmental Network
Iowa Citizens for Community Improvement
Iowa Citizens for Community Improvement
John Muir Project
Johns Hopkins Center for a Livable Future
Landelijk Netwerk Bossen- en
Bomenbescherming
Local Clean Energy Alliance
Locust Point Community Garden
Long Beach Alliance for Clean Energy
Maurice & Jane Sugar Law Center for
Economic and Social Justice
Mid-Ohio Valley Climate Action
Milwaukee Riverkeeper
MoveOn.org Hoboken
Movimento Mulheres pela P@Z!
Nassau Hiking & Outdoor Club
National Family Farm Coalition
NJ Forest Watch
North American Climate, Conservation and
Environment(NACCE)
Occupy Bergen County
One Fish Foundation
Partnership for Policy Integrity
People for a Healthy Environment
Physicians for Social Responsibility, Arizona
chapter
Plymouth Friends for Clean Water
Princeton Student Climate Initiative
Progressive Democrats of America, Tucson,
AZ Chapter
Public Goods Institute
Rachel Carson Council
Rainforest Action Network
Regenerate Washington
Revolving Door Project
River Guardian Foundation
Rural Education Action Project, DBA Rural
Vermont
S.W.A.R.M. of V.S.U.
securethefuture2100
SEED: Strategies for Ethical and
Environmental Development, Inc.
Slow Food USA
Socially Responsible Agriculture Project
South Shore Audubon Society
Southern Boone County Neighbors
Sunflower Alliance
Sustainable West Milford
Terra Advocati
The Enviro Show
TIAA-Divest! from Climate Destruction
Turtle Island Restoration Network
University of Maryland College Park
Wall of Women
Water Climate Trust
Waterspirit
Wiregrass Activists for Clean Energy (WACE)
Yadkin Riverkeeper
RapidShift Network
CatholicNetwork US

Businesses for a Livable Climate
CO Businesses for a Livable Climate
Small Business Alliance
Call to Action Colorado
Unite North Metro Denver
Wall of Women
North Range Concerned Citizens
Womxn from the Mountain
CA Businesses for a Livable Climate
The Green House Connection Center
Montbello Neighborhood Improvement
Association
I-70 Citizens Advisory Group
System Change Not Climate Change
Indivisible Ambassadors