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Rural Advancement Foundation International -USA

April 29, 2021

Seth Meyer
Chief Economist
Office of the Chief Economist
U.S. Department of Agriculture
1400 Independence Avenue S.W.
Washington D.C. 20250

RE: Docket No. USDA-2021-0003
Executive Order on Tackling Climate Change

Dear Chief Meyer:

Thank you for the opportunity to provide comments regarding the role of the agriculture in tackling the climate change crisis.

I am providing these comments on behalf of the member organizations of the National Organic Coalition. The National Organic Coalition is a national alliance of organizations representing the full spectrum of stakeholders with an interest in organic agriculture, including farmers, ranchers, conservationists, consumers, retailers, certifying agents, and organic industry members. NOC seeks to advance organic agriculture and ensure a united voice for organic integrity, which means strong, enforceable, and continuously improved standards to maximize the multiple health, environmental, and economic benefits that organic agriculture provides.

Our comments will focus on the role of organic agriculture as a climate-friendly system of agriculture that can be a key part of the solution to the climate change crisis.

The Science of Climate Change and Organic Agriculture

First and foremost, it is critical that we be clear about the state of science with regard to climate change and the farming practices that can help solve our global climate change challenges. There is no doubt that the science in this area will continue to evolve. There is plenty that we do not fully understand about the relationship between agriculture and climate change. But there are also some very clear messages that can be gleaned from the existing research that can point us in the right direction.



In the organic agriculture sector, we are very excited and engaged in this topic because there is strong science showing that, in general, organic practices are climate-friendly practices.

Important Role of Organic Agriculture in Addressing Climate Change

Organic agriculture is a promising, whole-systems approach to addressing the climate change crisis and other ecological crises. Organic production and handling practices have a proven, commercially viable, track record. These practices simultaneously sequester carbon in the soil, while eliminating petroleum-based pesticides and synthetic fertilizers that are sources of greenhouse gas emissions and harm biodiversity and public health. And, importantly, the data shows that this sector of agriculture is now operating without sacrificing productivity or profitability.

Organic regulations [Sections 205.203 & 205.205] require producers to:

- a. Maintain or improve soil organic matter.
- b. Select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion.
- c. Manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.
- d. Use crop rotations and cover crops to maintain and improve soil organic matter, and to manage plant nutrients and pests.

Pasture-based systems of livestock production are climate friendly. Section 205.237 in the organic regulations sets detailed standards regarding access to pasture requirements for organic livestock (7 CFR § 205.237).¹

The organic regulations prohibit the use of synthetic fertilizers and pesticides, which are significant contributors to greenhouse gas emissions and can harm soil life. In addition, organic operations are required to “comprehensively conserve biodiversity by maintaining or improving all natural resources, including soil, water, wetlands, woodlands, and wildlife.”

These are mandatory requirements for all organic producers.

Organic agriculture has led innovations in sustainable, climate-friendly farming for decades. Evidence has shown that organic farming systems build resilience to the effects of climate change, including extreme weather events such as drought and flooding.

¹ <https://www.ams.usda.gov/rules-regulations/access-pasture-organic-livestock>
<https://www.law.cornell.edu/cfr/text/7/205.237>



As USDA considers effective strategies to address the threat of global climate change utilizing existing programs, we offer the following recommendations:

1. Climate-Smart Agriculture and Forestry Questions

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?

- 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?**

Increase Research Funding Related to Climate-Friendly Farming and Land Management Practices

Our understanding of the scientific relationship between climate change and agriculture is evolving. While it is clear that agriculture is a significant contributor of greenhouse gas emissions, agriculture can also be a major part of the solution to the climate change challenge, if there is a significant shift in farming systems. However, many questions remain about which practices are most climate friendly, and whether regional variations require alternative strategies. In addition, the science of which metrics and tools farmers can use to measure the efficacy of carbon sequestration efforts is still in its infancy.

Without a significant increase in federal research dollars focused on these and related questions, it will be impossible to optimize any climate change action plan. Therefore, NOC endorses a doubling of federal funding for USDA competitive grant research programs such as the Agriculture and Food Research Initiative (AFRI), the Organic Agriculture Research and Extension Initiative (OREI), and the Sustainable Agriculture Research and Education (SARE) Program, with a focus on effective climate change strategies in the agriculture sector. A few examples of the type of research that should be conducted with this increased funding include:

- Continued research into the role of organically managed soils in carbon sequestration, with a particular focus on soil depth of carbon sequestration and storage;
- research into the development of credible, low-cost on-farm tools for documenting and tracking long-term improvements in soil health and carbon sequestration related to various land management systems, including organic management systems;



- research to advance organic no-till systems, and to measure the impact of tillage of organically managed soils with regard to carbon sequestration strategies; and,
- research regarding the opportunities for and barriers to local government conversion of land management practices for parks, transportation rights-of-way and other land areas to organic-based management practices. This research should include an analysis of how federal preemption policies that prevent localities from regulating the use of pesticides impact the ability of local governments to convert to organic land management systems.

Expand Education and Extension Efforts to Give Farmers Access to the Latest Research on Climate-Friendly Practices, and Provide Assistance in Implementing Those Practices

Even the best research about climate-friendly agricultural systems and practices is useless, unless farmers have access to that information and the best strategies to implement those systems. Extension service personnel should be required to receive training regarding the latest science on climate-friendly agricultural practices applicable to the geographic region. These efforts should be in collaboration with USDA Agricultural Research Service's regional climate hubs. In addition, funding should be increased for ATTRA, a federally funded information and research clearinghouse that provides high-value information and technical assistance to farmers, ranchers, Extension agents, and educators regarding sustainable agriculture. The increase in ATTRA funding should be specifically targeted to expanding ATTRA's capacity to disseminate information about climate-friendly agricultural practices.

Incentivize the Adoption of Climate Friendly Farming Practices

Existing USDA voluntary conservation programs, such as the Environmental Quality Incentive Program (EQIP), the Conservation Stewardship Program (CSP), and the Conservation Reserve Program (CRP) should be expanded to reimburse and incentivize the use of a suite of on-farm practices proven to reduce greenhouse gas emissions, build soil health, sequester carbon, and build resilience to the extreme weather patterns resulting from climate change. Such practices include cover cropping, crop rotations, rotational grazing, certain nutrient management practices, and others.

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.

Close Loopholes, Tighten Organic Standards, and Expand USDA Organic Enforcement

Organic is a voluntary system that allows farmers, suppliers and processors to opt-in to a more rigorous and environmentally sensitive standard of farming and food production, relative to conventional production. Those operations that chose to become certified as organic agree to meet these higher standards in exchange for the ability to have their products labeled as USDA Organic, which generally allows those operations to reap a higher price in the marketplace.

Because of its federally regulated standards that require use of soil-building farming practices and prohibit the use of fossil-fuel-based chemical fertilizers and synthetic pesticides, certified organic production should be the gold standard for climate-friendly agriculture. However, there are some areas where organic is falling short and where standards and enforcement structures must be improved to ensure that organic certification is always synonymous with climate friendliness.

Specifically, areas where organic standards and structures should be improved are:

- 1) Putting more teeth into USDA organic standards that require use of soil building practices, such as crop rotations, animal and green manures, careful tillage and compost to feed the soil, build soil health, and improve the soil's ability to sequester carbon;
- 2) Placing restrictions on the use of highly soluble nutrients, which are increasingly used by some organic farmers as a quick-fix method of feeding the plant, while bypassing more long-term soil health practices that promote carbon sequestration;
- 3) Fixing regulatory and enforcement shortfalls for livestock and poultry that enable more highly concentrated operations to be certified and allow some operations to deny animals meaningful access to the outdoors and to pasture. Research shows that some of the most climate friendly farming systems are those that combine livestock and pasture in a symbiotic relationship, in contrast to those operations that confine livestock in concentrated feeding operations for long periods of time, in excess of the carrying capacity of the land; and
- 4) Finalize regulations on standards that eliminate incentives to convert native ecosystems to organic production.



Organic is built on the concept of continuous improvement. These recommended changes to improve organic's ability to be the solution to global climate change should be viewed as part of the "continuous improvement" goal that is fundamental to the organic agriculture.

Incentivize the Transition to Organic Agriculture

USDA Certified Organic is the only full-scale, federally regulated systems-based approach to agriculture and therefore the most viable model of agriculture to enable significant change toward a more climate friendly agriculture.

Even though the enforcement improvements discussed above are needed, research already demonstrates that even organic as currently implemented is playing a positive role in mitigating climate change. For example, a study from Northeastern University, in collaboration with the Organic Center, was published in the journal *Advances in Agronomy* in January 2017 comparing organic and conventionally management soils.² "The study finds that, on average, organic farms have 44 percent higher levels of humic acid, 13 percent more soil organic matter, and 26 percent greater potential for long term carbon storage." This is significant because "... a higher level of humic substances in a soil means that more carbon is present."³

Other research has shown that if the standard practices used by organic farmers to maintain and improve soils were implemented globally, it would increase soil organic carbon pools by an estimated 2 billion tons per year –the equivalent of 12% of the total annual GHG emissions, worldwide.⁴

For that reason, the federal government should incentivize the transition to organic. Federal initiatives, including efforts to incentivize the transition to organic, must reach out to and involve people of color who have been the most heavily impacted by the negative aspects of the industrialized food system and food apartheid, are disproportionately impacted by climate change, and have been historically marginalized in USDA programs. Because of these disparate impacts, farmers of color and limited resource farmers should be prioritized in federal efforts to help mitigate and adapt to our changing climate.

Such policies should include:

²https://www.researchgate.net/publication/319869517_National_Comparison_of_the_Total_and_Sequestered_Organic_Matter_Contents_of_Conventional_and_Organic_Farm_Soils

³ <https://nuscimag.com/northeasterns-own-organic-breakthrough-68d7edd5fcf7>

⁴ Shonbeck, M. et al. (2018) *Soil Health and Organic Farming, Organic Practices for Climate Mitigation, Adaptation, and Carbon Sequestration*, Organic Farming Research Foundation, p. 42. <https://ofrf.org/soil-health-and-organic-farming-ecological-approach>



Restoring and expanding cost share assistance for organic certification

This program provides organic farmers and handling operations with a reimbursement to cover a portion of their annual organic certification fees. The cost share program is particularly important to small-to-mid-sized organic farms, underserved farmers, and those who are just starting out with organic certification.

Soon after the pandemic struck, NOC wrote to then-Secretary Perdue with recommendations of actions that could be taken to address COVID-19 impacts on organic farmers, businesses, certifiers, and consumers. Among those recommendations was one that called for reimbursement rates under Organic Certification Cost Share Program to be expanded from \$750 annually per operation, per certification scope, to \$1000, and for the cumbersome reimbursement procedures to be streamlined by providing reimbursements directly to organic certifiers.

Unfortunately, in August of 2020, USDA's Farm Service Agency took exactly the opposite action. The 2018 Farm Bill provided new funding for the organic certification cost share program, but the USDA provided inaccurate reports of carryover balances to Congress. This has resulted in a shortfall for the program for the rest of the years of the Farm Bill cycle.

Citing a funding shortfall related to botched FSA accounting procedures, the agency cut reimbursement rates in August 2020 from 75 percent of certification costs with a maximum of \$750 per certification scope for this program, down to 50 percent of certification costs with a maximum of \$500 per certification scope for this program. USDA has done a disservice to the organic community in this time of crisis by mismanaging this program. This has left organic operations burdened with an unplanned expense at the worst possible time, during the pandemic crisis.

In addition to restoring the reimbursement rates for Organic Certification Cost Share Program (OCCSP) for Fiscal Years 2020 and 2021, NOC also requests that, starting in Fiscal Year 2022, USDA:

- a) Increase reimbursement rates to \$1000 annually per certification scope per operation.
- b) Streamline and simplify the reimbursement process, by having reimbursements go directly to organic certifiers to reduce certification fees, as opposed reimbursing organic operations for the annual certification fees they pay to certifiers. This will result a more-timely reduction in certification cost burdens to organic operations, and reduce paperwork burden on these operations.
- c) 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?

Two additional ideas to incentivize the transition to climate-friendly organic agriculture include:

Creation of a Farmer-to-Farmer Mentorship Program for Farmers Transitioning to Organic

Farmers looking to move toward increased sustainability face difficult challenges during the 3-year transition period prior to certification, during which time the farmer incurs the higher production costs of organic without receiving the benefit of organic premiums.

To help address this tenuous period, funding should be authorized to create a National Organic Program (NOP)-accredited mentorship program to assist farmers during the transition period. Under this program, both the mentor farmer and the transitioning farmer would be eligible for a stipend to facilitate the process. These farmer-to-farmer mentoring programs would help new farmers understand organic practices and encourages their success. Producers just beginning their transition process will be paired with an experienced certified organic producer who operates a similar kind of operation as the transitioning farmer or rancher. An NGO, State Department of Agriculture, or university can coordinate the mentorship programs. Priority should be given to organizations and programs that provide mentorship to Black, Indigenous and other People of Color (BIPOC) farmers and historically underserved producers. Transitioning to organic requires the development of an entirely new set of skills and knowledge, and the mentors who can best share that knowledge are the farmers and ranchers who have already gone through the transition process.⁵

Addressing Land Access Challenges for Organic Farmers

In a 2017 survey conducted by the National Young Farmers Association, young farmers and ranchers said that the number one challenge they face is access to land.

For farmers who want to farm organically, the barrier of access to land is even higher because of the three-year transition period and higher cost of certified organic land. Data show that these barriers of access to land are even higher for farmers who identify as

⁵ Based on a broader proposal from National Sustainable Agriculture Coalition during 2018 Farm Bill process.



BIPOC. Policy initiatives to help address the land-access limitation in the organic sector should include:

- Expansion of the Agricultural Conservation Easement Program (ACEP) to include a prioritization for conservation of land that has been managed organically and BIPOC-owned land;
- Creation of a federal land-link program to connect retiring organic landowners with young or beginning farmers who are seeking organic land but cannot afford it. This program should also include legal resources, such as model leases, on how to structure lease agreements to respect the unique needs of both retiring and new organic farmers.
- Expansion of FSA grant and loan guarantee programs (such as the Highly Fractionated Indian Land Loan Program and Indian Tribal Land Acquisition Loan Program) for land acquisition for beginning and socially disadvantaged farmers under sustainable agriculture covenants.
- Establishment of lending guidelines for the Small Business Administration (SBA) and private loans to low-income resident farmers and BIPOC-led farmer cooperatives⁶.
- Appointment a USDA-led “land commission” to conduct a periodic national-scale land tenure study to provide a holistic perspective on socio-economic, political, and market-based factors limiting BIPOC access to land.⁵

Creation of a new Organic Stewardship Program within the NRCS

Certified organic farmers are utilizing climate-smart practices that reduce GHG emissions, sequester carbon, and promote resilience to extreme weather events. Organic farmers are required to use cover crops, rotate crops and use other practices to foster soil fertility and build soil health. Organic farmers are also required to adopt an Organic Systems Plan to detail the practices they will use to protect and enhance natural resources. Compliance with the strict requirements in the organic regulations is verified by third-party certifiers and through annual on-site inspections.

The more we can reward certified organic farmers for their climate-friendly practices and encourage more farmers to become certified as organic, the faster we can move the U.S. agriculture sector toward net zero GHG emissions goals, and more we can meet growing U.S. demand for organic food and fiber with products produced by U.S. organic farmers as opposed to importing organic products to satisfy that demand.

⁶ ⁶Soul Fire Farm & Northeast Farmers of Color alliance – Food Sovereignty Action Steps (2018)
https://docs.google.com/document/d/1dt0hicyhGdJSKIC3qyE1AbG9fdDrONjUh_M_bE0KMGs/edit#bookmark=id.rji88dqczea2



Therefore, we recommend the creation of a new Organic Stewardship Program within the Natural Resources Conservation Service to reward organic farmers for their use of climate-friendly farming practices, and thereby incentivize other farmers to become certified as organic. This program would provide annual payments to certified organic operations in recognition of the suite of climate-friendly practices that is required by the organic regulations and verified through the rigorous organic certification process.

B. How can partners and stakeholders, including State, local and Tribal governments and the private sector, work with USDA in advancing climate-smart agricultural land and forestry practices?

As referenced above, 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.

C. How can USDA help support emerging markets for carbon and greenhouse gases where agriculture and forestry can supply carbon benefits?

In climate change policy discussions with Congress and the new Administration, there has been a great deal of discussion about using a carbon market approach to reward farmers for making climate-friendly changes to their farms. We see some challenges with this approach:

- The potential for greenwashing could be a significant problem. How can we be sure that carbon markets will reward practices that are truly climate friendly? Who decides that?
- Most organic farmers have been using climate-friendly practices for years because organic standards:
 - Prohibit use of the biggest greenhouse gas emitting fertilizers and chemicals; and
 - Require soil-building practices, which have been shown to increase carbon sequestration in the soil.
- Will farmers already using good practices be rewarded through a carbon market approach, or will carbon markets only focus on farmers who are newly adopting those practices?

We believe the most effective way to incentivize farmers to use climate friendly farming practices is to focus on existing USDA conservation programs, such as the Environmental Quality Incentives Program (EQIP), the Conservation Stewardship Program (CSP), and the



Conservation Reserve Program (CRP). Funding for these programs should be expanded and targeted toward rewarding farming practices that are proven to reduce greenhouse gas emissions and increase carbon sequestration.

Another concern we have about focusing on the carbon market approach is that the model will perpetuate the impacts of pollution on communities of color. These are the communities most often impacted by industrial greenhouse gas emissions and other co-pollutants. Existing carbon offset markets allow power plants and other industrial polluters to purchase credits that permit them to continue burning fossil fuels and polluting. This will only exacerbate pollution hot-spots in low-wealth communities and communities of color.

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

As referenced earlier in our comments, NOC recommends a significant increase in federal research dollars focused on organic agriculture and climate change. Specifically, NOC endorses a doubling of federal funding for USDA competitive grant research programs such as the Agriculture and Food Research Initiative (AFRI), the Organic Agriculture Research and Extension Initiative (OREI), and the Sustainable Agriculture Research and Education (SARE) Program, with a focus on effective climate change strategies in the agriculture sector. A few examples of the type of research that should be conducted with this increased funding include:

- Continued research into the role of organically management soils in carbon sequestration, with a particular focus on soil depth of carbon sequestration and storage;
- research into the development of credible, low-cost on-farm tools for documenting and tracking long-term improvements in soil health and carbon sequestration related to various land management systems, including organic management systems;
- research to advance organic no-till systems, and to measure the impact of tillage of organically managed soils with regard to carbon sequestration strategies; and,
- research regarding the opportunities for and barriers to local government conversion of land management practices for parks, transportation rights-of-way and other land areas to organic-based management practices. This research should include an analysis of how federal preemption policies that prevent localities from regulating the use of pesticides impact the ability of local governments to convert to organic land management systems.

In addition, NOC supports the climate change-related organic research recommendations of the Organic Farming Research Foundation.⁷

⁷ <https://ofrf.org/wp-content/uploads/2020/08/RESEARCH-PRIORITIES-FOR-ORGANIC-AGRICULTURE-AND-CLIMATE-CHANGE-2020.pdf>



E. How can USDA encourage the voluntary adoption of climate-smart agricultural and forestry practices in an efficient way, where the benefits accrue to producers?

As referenced earlier in our comments, NOC believes the most effective way to incentivize farmers to use climate friendly farming practices is to focus on existing USDA conservation programs, such as the Environmental Quality Incentives Program (EQIP), the Conservation Stewardship Program (CSP), and the Conservation Reserve Program (CRP). Funding for these programs should be expanded and targeted toward rewarding farming practices that are proven to reduce greenhouse gas emissions and increase carbon sequestration.

4. Environmental Justice and Disadvantaged Communities Questions

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?

The House Agriculture Committee hearing on the State of Black Farmers in the U.S., held on March 25th, highlighted the importance for USDA to partner with local, trusted organizations with strong networks (including local nonprofits, faith-based organizations, and 1890 Land Grant Universities) to ensure that programs, funding and financing capacities were appropriately disseminated and utilized by the intended audiences.

Program resources and application materials should be available in relevant languages and communication mediums.

Furthermore: currently, organic products are not eligible for federal procurement in many institutional programs, effectively excluding access to the organic community by virtue of income—often excluding Black, Brown, or Indigenous people. Including provisions for procurement of organic products in programs such as the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), which serves low-income women, infants, and children up to age five, would expand access to organic food and nourish some of our nation’s most vulnerable populations.

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?

Discriminatory practices have led to an unequal distribution of technical assistance.

Some recommendations include:



- USDA should target outreach, technical assistance, opportunities and support to BIPOC producers, landowners, and communities.
- USDA should consider where historically underserved producers, landowners, and communities are located when allocating resources.
- USDA should increase funding for the USDA Conservation Programs, specifically the Conservation Reserve Program (CRP), Environmental Quality Incentives Program (EQIP), and Conservation Stewardship Program (CSP), with increased on-ground staff and technical assistance capacity to successfully service their regions.
- USDA should ensure adequate training among FSA and NRCS staff at the state and county level regarding (1) existing opportunities to support historically underserved producers, landowners, and communities, and (2) recruit and hire more BIPOC individuals to serve as FSA and NRCS agents, building a bench by partnering with 1890 Land Grant Universities and offering internships that may lead to employment opportunities.

As mentioned above, partnering with on the ground, trusted organizations will be crucial to ensure appropriate and relevant technical assistance.

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?

As mentioned previously, USDA should set up a mentorship program to facilitate the transition to organic agriculture and should address land access challenges for organic producers. Priority should be given to organizations and programs that provide mentorship and increase land access for BIPOC farmers and historically underserved producers.

In addition to the strategies mentioned in 4.A. and 4.B., USDA should be transparent about resource allocation and consider accountability measures regarding that allocation.

NOC recommends following equity experts to provide oversight on USDA programs.

How the Lessons of the Pandemic Relate to Climate Change

One of the primary topics in the climate change policy conversation relates to how to establish a food system that is more resilient to the impacts of global climate change.

Over the last year, as the world dealt with the most immediate crisis in the form of COVID-19, the spotlight temporarily moved off of the climate change crisis facing our planet. It is our hope that the pandemic experience has helped us understand more about how to make our food system more resilient, not only to pandemics but also to climate change as well.



The COVID-19 pandemic has taught us a great deal about the societal need for a more resilient food system, and the related lesson about the fragility of long supply chains and food production and processing models once thought to be efficient. The reality that we now know is that “efficiency” in the food system can also coincide with fragility in the food system.

The irony is that the shift in societal attention away from the climate change crisis and toward the pandemic has led to some significant reductions, albeit temporary, in greenhouse gas emissions. According to a study published in the journal *Nature Climate Change* on May 19, 2020, “[d]aily global CO₂ emissions decreased by -17% (-11 to -25% for $\pm 1\sigma$) by early April 2020 compared with the mean 2019 levels, just under half from changes in surface transport.” In comparison, “[b]efore the COVID-19 pandemic of 2020, emissions of carbon dioxide were rising by about 1% per year over the previous decade, with no growth in 2019.”⁸

While expectations are that the greenhouse gas (GHG) emissions will increase again as the economy recovers, the temporary reductions demonstrate that it is possible to make significant progress toward our GHG reduction goals through bold action. The same can and should be true for the climate change related role of the food and agriculture sector, as well.

We are grateful that the President is taking seriously the climate change crisis facing our planet, and for this opportunity to provide our perspectives on this critical topic.

Thank you for your consideration of these comments.

On behalf of National Organic Coalition Members:

Abby Youngblood
Executive Director, National Organic Coalition

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⁸ Le Quéré, C., Jackson, R.B., Jones, M.W. *et al.* Temporary reduction in daily global CO₂ emissions during the COVID-19 forced confinement. *Nat. Clim. Chang.* (2020). <https://doi.org/10.1038/s41558-020-0797-x>



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