

March 31, 2023

The Honorable Debbie Stabenow
Chairwoman
Senate Committee on Agriculture
328A Russell Senate Office Building
Washington, D.C. 20510

The Honorable John Boozman
Ranking Member
Senate Committee on Agriculture
328A Russell Senate Office Building
Washington, D.C. 20510

Dear Chairwoman Stabenow and Ranking Member Boozman:

On behalf of the Union of Concerned Scientists (UCS) and its more than 500,000 supporters nationwide, we are pleased to submit the following policy recommendations to inform the next farm bill. UCS is a national science-based non-profit organization working for a healthy environment and a safer world. We combine independent scientific research and citizen action to develop innovative, practical solutions to secure responsible changes in federal and state policy, corporate practices, and consumer choices.

The United States Needs a New Food and Farm Bill

Our nation's food and farm systems have been shocked and tested by [climate change](#), a [global pandemic](#), supply chain disruptions, significant inflation and corporate price-gouging, and [the ripple effects of Russia's war in Ukraine](#). Additionally, the socioeconomic status of communities of Black, Indigenous, and other people of color (BIPOC) reflects a [long history](#) of theft and loss of land and capital, justified by racist ideologies and often perpetrated by official government policies.

Congress must begin to remedy past and ongoing inequities and bolster farmers, food workers, eaters, and communities against future disruptions that are sure to come. We cannot wait another half decade for transformative change. By moving on from today's outdated model of farm policy to embrace the notion of a *new food and farm bill*, Congress can begin to transform our food system into one that centers racial equity, ends hunger, meets the climate crisis head on, increases access to nutritious food and nutrition security, ensures safety and dignity for the 20 million food and farm workers that feed our nation, and supports farmers and consumers by promoting competition in the food and agriculture sectors.

To address these issues and mitigate against future shocks to the food and farm system, UCS strongly urges the Senate Agriculture Committee to incorporate the policies listed below in the next farm bill.

Although some of the provisions below may not yet have the votes to pass the Senate, UCS is working with scores of partners across the country to make a highly visible case for racial equity and climate action in this farm bill, harness broad public support, and create conditions under which Senate passage of a truly transformational bill is possible.

The marker bills, platforms, and provisions listed in this document are a collection of policies that UCS endorses to date. We intend to extend our support of additional policies throughout the farm bill policymaking process.

Marker bills that UCS recommends for incorporation into a new food and farm bill include:

- The Agriculture Resilience Act
- The Justice for Black Farmers Act
- The Protecting Americas Meatpacking Workers Act
- Local Farms and Food Act of 2023
- Strengthening Local Processing Act
- The Food and Farm Act
- The Farm System Reform Act
- Industrial Agriculture Accountability Act
- Opportunities for Fairness in Farming Act
- Protect America's Children from Toxic Pesticides Act
- Growing Organic Food Systems Program
- COST of Relocations Act

Organizational farm bill platforms that UCS supports and echoes throughout this policy document include:

- [National Sustainable Agriculture Coalition Farm Bill Platform](#)
- [The National Young Farmers Coalition Agenda \(2022\)](#)
- [Food Research and Action Center Farm Bill Platform](#)
- [United Food and Commercial Workers Farm Bill Platform](#)
- [Health, Environment, Agriculture, and Labor \(HEAL\) Food Alliance Farm Bill Platform](#)

Policies that UCS will oppose in the next farm bill:

- Any cuts to the \$20 billion allocated to conservation and conservation technical assistance in the Inflation Reduction Act
- Any cuts to the SNAP program
- Any cuts to the Conservation Stewardship Program (CSP) or the Environmental Quality Incentives Program (EQIP)
- Any anti-environmental riders
- Any provisions that establish or advance market-based approaches that rely on agricultural soil carbon sequestration to offset emissions produced by other industries, particularly to meet mandatory obligations to reduce emissions. ([UCS Report](#))

In addition to the marker bills and farm bill platforms listed above, UCS recommends the following policies be included in the next farm bill.

Policies to Build a Climate-Resilient Food & Farm System

Scientific Integrity Focused Research

- Increase funding for the US Department of Agriculture's (USDA's) Office of the Chief Scientist to ensure the office can independently coordinate between agencies and maximize return on federal investment in public research.
- Support the USDA's Economic Research Service (ERS) – To remedy the worst impacts of the 2018 relocation of ERS from Washington, DC to Kansas City, the next farm bill should:
 - Provide additional support and opportunity for administrators to advance overall staff capacity—particularly to add capacity for urgently needed research areas such as agroecology, sustainable nutrition science (SNS), interdisciplinary social science, and climate change.
 - Preserve ERS as part of the USDA's Research, Education, and Economics (REE) mission area to retain the organizational firewall between the Office of the Secretary and the Office of the Chief Economist.

Climate Focused Research

- Establish soil health and agriculture resilience to mitigate climate change and other stresses as research priorities within the USDA's Agricultural Research Service (ARS) and across all National Institute of Food and Agriculture (NIFA) competitive programs.
- Prioritize climate mitigation and adaptation agriculture research across REE.
- Prioritize and invest in agroecology and systems-based research across REE.

- Add a new purpose to the REE mission area that requires that research be conducted to “Develop food systems that are more healthful, sustainable, equitable, and resilient to increasingly extreme weather and other potential intersecting global and national disruptions.”
- Add a research priority area within the Agriculture and Food Research Initiative (AFRI) under the Food Safety, nutrition, and health priority for “research at the intersection of: production, climate and the environment, and nutrition and health equity.”
- Establish an REE coordinator to identify gaps in research not yet addressed by either the public or private sector.
- Add a new climate change adaptation and mitigation subprogram to the AFRI program and shift funding from technological solutions for inherently unsustainable, low-resilience production systems towards agroecological approaches. The AFRI program should also prioritize SNS research.
- Reauthorize the Sustainable Agriculture Research and Education (SARE) program with mandatory funding of at least \$100 million per year and include climate change mitigation and adaptation as a new priority and purpose within SARE’s statutory mission. Authorization of appropriations for SARE’s extension, outreach, and professional development program should be increased from \$20 million to \$30 million per year. The SARE program should increase representation within each SARE regional Administrative Council to include 1890 and 1994 Land Grant Universities (LGUs) and Hispanic Serving Institutions to ensure equitable engagement.
- Increase investment in organic research, including but not limited to:
 - Providing mandatory funding for the Organic Agriculture Research and Extension Initiative (OREI) at no less than \$60 million per year in 2024, increasing to \$100 million in 2028.
 - Increasing Organic Transitions program (ORG) discretionary funding to \$20 million by FY 2028.
 - Opening ORG eligibility criteria to mirror that of OREI to include non-LGU applicants increasing ARS’s budget for intramural organic research.
 - Reinstating the department-wide organic coordinator.
 - Prioritizing greater data integration for the National Agricultural Statistics Service (NASS) and Agricultural Marketing Service (AMS) organic production data to assist the Risk Management Agency (RMA) with the development of risk management products for organic producers (such as Whole-Farm Revenue Protection) and the Natural Resources Conservation Service (NRCS) with the implementation of conservation programs and practices in organic systems.
- Codify Climate Hubs – The Agriculture Resilience Act (ARA) calls for the first ever authorization at \$50 million per year and would codify the national

network of regional hubs to support climate risk mitigation and adaptation, which UCS supports.

- Authorize the Long-Term Agroecosystem Research (LTAR) network – The ARA would provide the first ever authorization at \$50 million per year while also establishing climate adaptation and mitigation as a major statutory purpose of the network.
- Establish diversified, perennial-based and perennial-annual integrated farming systems, advanced grazing management, and livestock-crop integrated systems research priority areas at ARS and NIFA.
- Create a “seeds and breeds” coordinator position– the next farm bill should create a public breed and cultivar research coordinator position within the REE mission area to ensure the USDA can continue to maintain and build a diversity of crops and livestock breeds with climate-adaptable and other beneficial traits that are broadly accessible to all US farmers.

Equity Focused Research

- Prioritize research within REE that addresses the unique impacts of climate change on BIPOC farmers, farmworkers, and members of low-income communities.
- Require baseline diversity, equity, and inclusion data on grant applicants with the goal of producing more equitable funding outcomes as a first step.
- Increase funding for the Food Safety Outreach Program (FSOP) – Increase funding by at least \$20 million annually in mandatory funding to reach a broad geographic and demographic audience of small and mid-sized producers.
- Increase diversity of BIPOC farmers and alternative food system stakeholders in USDA’s policy and grant-making decisions, including those who serve on review panels.
- Prioritize capacity-building for BIPOC farmers within key REE programs. Investments should be increased for the following programs:
 - 1890 Centers of Excellence
 - 1890 Cooperative Extension System
 - 1890 National Scholarship Program
 - New Beginning for Tribal Students program
 - Federally Recognized Tribes Extension Program (at least \$30 million)
- Establish inequities research programs at ERS and NIFA with two purposes: 1) to build a portfolio of research at ERS and NIFA on social and economic inequities across sectors of the food system (e.g, farming, farmworkers, food processing, distribution, consumer food choices) and 2) to improve minority-serving and capacity-building competitive grant programs and require ERS to assess agronomic, economic, social, and food-supply chain issues that were caused by the COVID-19 pandemic, including impacts on food safety, food

prices, household food expenditures, health equity, food insecurity, utilization of nutrition assistance programs, farm prices, farm family incomes, and planting and other management decision that are driven by the pandemic.

Conservation and Improving Soil Health

The Agricultural Act of 2014 removed \$6 billion from the farm bill's Conservation Title. The Agriculture Improvement Act of 2018 did not increase or restore conservation funding to make up for the funds lost in 2014. CSP, in particular, lost funding in both bills: \$2 billion in 2014 and \$5 billion in 2018. The next farm bill must reverse this funding trend for the Conservation Title and specifically for CSP. Even with the funds appropriated in the Inflation Reduction Act of 2022, conservation funding has not recovered to pre-2014 levels.

This year, the ARA is one vehicle for reform to the Conservation Title. The ARA's goal is to achieve net-zero agricultural greenhouse gas (GHG) emissions by 2040 and improve the resilience of farms by enabling them to shift to practices that drastically reduce their vulnerabilities to the impacts of severe weather associated with climate change. Such practices improve soil health, maintain soil cover, reduce erosion, improve water quality, create biodiverse habitats, and create new economic opportunities for farmers. The ARA provides the framework for *some* of the following Conservation Title recommendations.

- Increase the CSP and EQIP set-asides for beginning and socially disadvantaged farmers and ranchers to 30 percent.
 - Add a requirement that NRCS state directors conduct significant outreach to farmers of color to meet their set aside.
- Expand the advance payment option (currently 50% for historically underserved producers) to 100% so that initial capital investment is not a deterrent from program participation.
- Increase the technical assistance available to beginning, socially disadvantaged, and veteran farmers and ranchers by ensuring office, language, and program accessibility. For example:
 - Require translation of all documents at the initial time of release
 - Provide culturally-appropriate technical assistance.
 - Increase cooperative agreements to fund non-profit partners to support technical assistance.
 - Allow farmers to apply online or in a different office if they have a negative experience at a county NRCS office.
 - Modernize the application process so that farmers do not need to drive long distances to apply for programs.
- Increase Access by Establishing Payment Limits

- Re-establish CSP and establish EQIP payment limits of \$200,000 for any five-year period. Payment limits are an important program element that ensure the most well-resourced farms do not capture an outsized portion of public conservation spending. Such farms are often in the best position financially to undertake conservation efforts on their own. Public resources need to be reserved for farms that do not have this capability. The IRA reauthorized both EQIP and CSP through 2031 without extending the existing payment limits in each program. This means that without additional action from Congress, payment limits will cease to exist in either program after the current farm bill expires at the end of FY 2023.
 - Ensure payment limits apply not just to individuals, but also to joint ventures and general partnerships.
- Increase access for organic producers—Both EQIP and CSP should continue to offer Organic Initiatives with separate ranking and funding pools for organic producers.
- Increase access by simplifying and demystifying the application process.
 - NRCS should increase the transparency and ease of application for the working lands conservation programs, including improvements to the Conservation Assessment Ranking Tool and information about its use.
 - NRCS should be required to provide a report to all applicants to working lands conservation programs explaining how their application was ranked.
- Increase access by expanding conservation technical assistance.
 - Congress should create a special technical assistance initiative that sets aside one percent of total farm bill conservation program mandatory funding each year for a major new conservation technical assistance initiative to assist producers in mitigating and adapting to climate change.
 - Dedicate technical assistance funds to training or hiring NRCS and Farm Service Agency (FSA) staff capable of promoting polycultural perennial practices and their high climate and broader environmental value.
 - Allow technical assistance funds to support innovative farmers training other farmers.
 - Recognizing that innovative farmers understand the challenges of implementing conservation practices better than anyone else, a portion of the Special Technical Assistance funding should be available to directly compensate farmer leaders that provide assistance to other farmers adopting conservation practices.

- Prioritize soil health testing.
 - Make soil health testing cost-share a standard part of CSP, EQIP, and Regional Conservation Partnership Program (RCPP) contracts that involve soil health practices.
 - Congress should direct NRCS to streamline the certification process for the NRCS Technical Service Provider (TSP) program.
 - Expand the Conservation Technical Assistance Program to provide support through NRCS or other contracted service providers to farmers affected by per- and polyfluoroalkyl substances (PFAS) contamination to change their farm management practices due to varying levels of contamination.

- Increase CSP funding—Provide \$4 billion per year to CSP for new contracts over the life of the next Farm Bill. Since the 2018 farm bill, we have seen a dramatic increase in farmer applications to CSP. However, the program has been shrinking in recent years due to a lack of funding. Lack of funds coupled with high farmer interest has led to only about a quarter of farmers who apply to the program ultimately receiving contracts.
 - Improve access to CSP.
 - Reduce financial barriers.
 - Congress should ensure that if losses in revenue occur due to climate-friendly production, such losses are considered when determining CSP payment amounts.
 - Congress should direct USDA to update its rule on the minimum payment rate for CSP and raise the minimum payment rate for all eligible CSP participants on a regular basis to keep up with inflation.
 - Contract renewals
 - Reinstate automatic renewals for qualified farmers after their first CSP contract.
 - Create a reduced payment renewal option for farmers that have met the threshold for all PRCs and cannot adopt an additional meaningful conservation activity on their farm.
 - Enhance the pathway from EQIP to CSP
 - Codify a pathway from EQIP to CSP. The next farm bill should recognize the long-term challenge farmers face in beginning to experiment with these practices and committing to continued improvement by providing a clear pathway from EQIP and EQIP-Concentration Incentive Contracts (CIC) into the CSP program. Farmers who successfully use EQIP and EQIP CIC to adopt in-field management practices and

- address enough Priority Resource Concerns to qualify for CSP should be given priority in their application.
 - CSP practices should receive 75 percent cost-share, just as in EQIP.
- Enhance CSP’s environmental benefits.
 - Congress should direct NRCS to require all states to adopt a soil health priority resource concern (PRC) along with a minimum of four to five other resource concerns.
 - Congress should add climate adaptation and mitigation as a priority resource concern that may be addressed by the program.
 - Congress should add Tribes to the list of entities defining Priority Resource Concerns.
- Strengthen CSP’s climate focus.
 - The 2023 Farm Bill should add soil health enhancement, GHG emission reduction, and resilience to the impacts of climate disruption to the criteria for ranking proposals for entry into CSP.
 - Congress should require that USDA adopt climate focused bundles under CSP, and those bundles should be paid at a rate of 150 percent of other CSP bundles in order to encourage adoption. Climate-focused, holistic bundles offer opportunities to implement the highest-quality approaches in terms of GHG mitigation—including agroforestry systems, perennial cropping systems, and advanced grazing management. The current payment rates within CSP reward enhancements and bundles at low rates that discourage adoption. For example, the payment rate for a soil health bundle that includes a cover crop enhancement plus two or three other enhancements is less than the EQIP payment rate for adopting the basic practice of cover cropping.
 - Congress should highlight the highest value climate-friendly practices by requiring NRCS to create materials that inform CSP applicants of the practices most likely to receive consideration for contracts under the provisions of the IRA.
- Polycultural perennialization
 - Congress should create new supplemental payments for perennial production systems in line with current payments for resource conserving crop rotations,

management intensive rotational grazing, and advanced grazing management.

- The payment term for woody perennial-based practices shall be longer than for other permitted CSP practices. Allow CSP contracts supporting the development of polycultural perennial systems to range between 10-15 years.
- Systems receiving supplemental payments should pass high ecological thresholds:
 - The soil in the system should have perennial living cover, without bare ground.
 - Polyculture should be a focus of any of the above systems, with multi-species mixes that include trees and may include (perennial) brambles, shrubs, grains, legumes, vegetables, other herbaceous plants, cover crops, and/or livestock, all as regionally appropriate.
 - Such systems should include a goal of better hosting wildlife, from songbirds to game animals, as regionally and locally possible.
- High-level, polycultural, climate-friendly practices should receive 85% cost share to incentivize their use. In addition, the Secretary should prioritize these practices and associated enhancements over others in CSP because of their strong environmental/climate benefits.
- Advanced grazing management
 - Congress should maintain increased cost share for Advanced Grazing Management in CSP and require NRCS to develop improved advanced grazing bundles.
- Support for organic production
 - Congress should ensure that the CSP fully supports the conservation efforts of USDA certified organic and transitioning-organic farmers and ranchers.
- Research in CSP
 - Create a new CSP On-Farm Conservation Stewardship Innovation Grant Program
- Public-private partnerships
 - Establish a new authority within the USDA for contribution agreements with individuals and public and private entities that would fulfill the program's purposes and support conservation activities that sequester carbon, reduce GHG emissions, and achieve

other environmental benefits, subject to terms and conditions established by the Secretary.

- Environmental Quality Incentives Program (EQIP)
 - Increase funding—Provide \$2 billion per year to EQIP for new contracts over the life of the next Farm Bill.
 - Reduce Financial Barriers and Improve Access—Provide 100 percent up-front cost share support for qualified farmers.
 - Enhance EQIP’s climate and environmental benefits.
 - Improve cost-share rates for ecological management.
 - Increase cost-share rates for practices of high ecological benefit, as distinct from those that support the construction of infrastructure.
 - Provide upfront cost-share to practices with high ecological benefit.
 - Set cost-share rates for infrastructural practices at up to 50 percent for general participants and up to 75 percent for historically underserved participants.
 - Maintain existing cost share support for high tunnels. High tunnels (also known as hoop houses) are structures that modify the growing environment through the construction of hoops covered with plastic that are placed over the growing area. Unlike some greenhouses, high tunnels require no energy as they rely on natural sunlight to modify the inside climate, creating favorable conditions for producing vegetables and specialty crops.
 - Set cost share rates for ecological management practices that entail a one-time installation investment (e.g., riparian buffer, field border, hedgerow, and many other perennial planting practices) at a one-time cost-share level of 75 percent in recognition of their contribution to high level environmental and agricultural resilience benefits.
 - Set cost-share rates for ecological management practices that require annual implementation (e.g., conservation crop rotation and cover cropping in annual cropping systems, nutrient management, pest management, no-till and reduced till, prescribed grazing, etc.) at 75 percent for each year of the EQIP contract in recognition of their significant contributions to soil conservation, soil health, climate mitigation and agricultural resilience.

- Create a pathway from EQIP and EQIP CIC into CSP, beginning with education of the opportunity to move between programs and a discussion on how to use EQIP to become eligible for CSP.
- Enhance EQIP's overall climate focus.
 - Permanently add GHG emissions reduction, carbon sequestration, and climate resilience to EQIP's statutory purpose.
 - Allow producers wishing to cut their EQIP-CIC contracts short in order to graduate to a Conservation Stewardship Program (CSP) grant to do so upon the granting of a CSP contract.
- Target Livestock Funding Toward Climate Resilient Production Systems
 - When Congress created EQIP in the 1996 Farm Bill, it carved out 60 percent of total program funding to go toward livestock operations. Alongside that carve out, it also included a prohibition on EQIP dollars going to large CAFOs. The 2002 Farm Bill continued the carve out, but it also removed the restrictions on providing assistance to large CAFOs to construct animal waste management facilities. The current set-aside for standard EQIP practices stands at 50 percent, although EQIP funding through the Inflation Reduction Act does not include this set-aside. While there are many livestock operations that currently utilize EQIP funding for critical conservation practices, an unfortunately large percentage of funding from the program is used to help CAFOs pay for structural practices such as waste lagoons, animal mortality facilities, and waste treatment facilities.
 - UCS supports the 1996 Farm Bill prohibition of EQIP funds going to large CAFO's and believes it should be reinstated in the 2023 Farm Bill.
 - Additionally, UCS supports the Farm System Reform Act which would place a moratorium on CAFO's and requires that CAFO's stop operating after January 1, 2041 due to the negative environmental impact they have had to date.
- Create a new livestock set aside that exclusively funds advanced grazing management practices and those structural practices that facilitate a transition to sustainable grazing systems.

- Leverage EQIP for soil health
 - Shift cover crop contracts from 3-year to 5-year contracts.
 - Make cost-share for soil health testing a standard part of every EQIP contract that involves a soil health practice/system, with results shared with both farmer and NRCS.
 - Provide fencing and water (where needed) to facilitate grazing of cover crops and dual crops/ forages to help restore soil health.
 - Pilot a streamlined continuous signup EQIP cover crop contract for farmers who have already adopted conservation tillage.
 - Ensure that EQIP funding for irrigation infrastructure addresses in-stream flows and consumptive use.
 - To further reduce drought challenges, particularly in the West, provide a higher 85 percent cost-share rate for high-level, climate friendly conservation practices standards (CPS) that are also drought-resilient.
 - Establish a priority for producer applications using EQIP to adopt native water-conserving crops, water-conserving crop rotations, and deficit irrigation in the Water Conservation portion of the program.
 - Provide a higher cost-share of 85 percent for practices that effectively manage higher rainfall events that are becoming increasingly common across the country.
- Conservation Reserve Program - The Conservation Reserve Program (CRP) is the largest federal agricultural conservation program by dollars, paying landowners to retire up to 27 million acres of farmland from production for 10- 15 years at a time.
 - Acreage cap
 - Ensure new acres enrolled in CRP do not come at the expense of other working lands programs.
 - Increase Grasslands minimum enrollment to at least 10 million acres.
 - Reserve at least 10 million acres each year for CCRP
 - Permanent CRP easements
 - Authorize permanent CRP easements for land that has been enrolled in CRP at least twice, land that exceeds an erodibility index of greater than 15, and riparian

areas that participants wish to maintain in buffers in perpetuity.

- Payment reform
 - Extend incentive payments to all continuous practices.
 - Restore payments for mid-contract management.
 - Eliminate payment reduction for incidental grazing of buffers.
 - Raise rental rates for continuous signups back to their 2014 farm bill levels.
 - Prioritize land operating under an approved comprehensive conservation plan for grassland enrollments, as well as land using managed rotational grazing; provide a supplemental payment to support management-intensive rotational grazing.
 - Create an Agroforestry Initiative inside CRP
- CRP Transition Incentives Program (TIP)
 - Build TIP funding in the CRP baseline so the program can meet the anticipated demand in the coming years.
 - Given the large demand for land by beginning, veteran, socially disadvantaged, and other farmers, funding for TIP in the next farm bill will be more important than ever.
- Agricultural Conservation Easement Program (ACEP)
 - Increase funding for ACEP to at least \$700 million per year.
 - Prioritize Agricultural Land Easement (ALE) projects that maintain agricultural farm viability and include affordability protections, such as an option to purchase at agricultural value (OPAV).
 - Prioritize beginning and historically underserved farmer access to ACEP.
- Natural Resource Benefits—Require comprehensive conservation plans for Agricultural Land Easements (ALE), including for lands that are neither Highly Erodible Lands (HEL) nor grasslands.
- Ensure both NRCS staff and certified Technical Service Providers (TSPs) can support conservation planning on land enrolled in ALEs.
- Establish an expedited enrollment option for farms with ALEs in the Conservation Stewardship Program (CSP).
- Regional Conservation Partnership Program (RCPP)
 - Provide \$500 million in annual baseline funding to RCPP.

- Target climate and soil health through RCPP by:
 - Establishing a new priority for applications to all RCPP competitions that improve soil health.
 - Requiring that projects addressing this new priority do so in a way that complements additional conservation goals established for the program.
 - Adding climate change mitigation and adaptation (or Soil Health) to the list of project types eligible for five years' worth of payments to producers; and
 - Adding climate change mitigation and adaptation (or Soil Health) to the list of activities used for addressing Priority Resource Concerns in Critical Conservation Areas.
- Limit Carbon Market Pilot Projects Establish a statutory annual maximum of three carbon market pilot projects that can be funded as AFA performance-based payment or environmental market projects.
- Technical Assistance and Outreach--Expand the advance funding allowance for RCPP Classic outreach, education, and TA activities to 180 days.
- Require the Secretary to support eligible partners measuring the environmental, economic, and social benefits of funded projects.
- Establish an actionable goal for targeting RCPP funding to support Historically Underserved Producers.
- Create a funding pool for smaller organizations with adjusted administrative requirements and rules for using funding.
- Grazing Land Conservation Initiative
 - Provide mandatory funding of \$50 million per year over the life of the farm bill.
 - Maintain the current authorization for appropriations of \$60 million per year.
- Support for state soil health assistance programs
 - Create new USDA grants to state and tribal governments to improve soil health on agricultural lands by funding the development or implementation of state or Tribal soil health plans. Implementing an approved soil health plan can include funding for any combination of technical assistance, financial assistance, research and development, education and training, and monitoring and evaluation.
 - The federal grant should be capped at \$1 million for projects to develop or modify a state or tribal soil health plan and \$5

million for projects to implement a state or tribal soil health plan.

- Applications should include performance measures to be used for evaluation.
- The new program should be funded at \$60 million per year (2024-25), \$80 million (2026-27), and \$100 million (2028 and thereafter).
- Alternative Manure Management Program
 - Congress should disallow the use of funds for anaerobic digesters for CAFOs from any USDA program.
 - Congress should create a new Alternative Manure Management Program (AMMP) to support non-digester dairy and livestock methane management strategies to effectively reduce greenhouse gas emissions and to maximize environmental benefits, including conversion of dairy and livestock operations to eliminate or reduce the quantity of manure stored in anaerobic conditions, alternative manure treatment and storage practices, and conversion to solid separation systems.
 - The program should provide 90 percent cost share (up to 50 percent in advance for needed equipment and materials), up to \$750,000 in any 5-year period, with an option for cluster applications for centralized composting facilities. Congress should provide mandatory funding of \$1 billion per year for this program beginning in FY '24.

Policies to Boost Economic Opportunities for BIPOC and Other Farmers

- Expand credit assistance for socially disadvantaged farmers/ranchers.
 - Develop a pre-approval and pre-qualification process for Farm Service Agency (FSA) Direct Farm Ownership Loans to establish FSA as an appropriately competitive loan making institution.
 - Ensure FSA Direct Farm Ownership Loan limits remain adequate by indexing them to land values.
 - Secure FSA debt relief for Socially Disadvantaged and Economically Distressed farmers, including guaranteed loan borrowers.
 - Expand funding for, and effectively implement, the Indian Tribal Land Acquisition Loan Program and the Highly Fractionated Indian Land Loan Program.

- Pilot a program within FSA to allow Socially Disadvantaged and Economically Distressed farmers to consolidate and refinance commercial debt that may be standing in the way of affording secure land access.
- Require FSA loan officers to waive the credit elsewhere test for Socially Disadvantaged and Economically Distressed applicants for FSA loan products.
- Provide FSA loan officers with guidance on working with collective, cooperative, and non-familial structures.
- In considering loan applications where profit and growth are not the principal goals of the operation, provide FSA loan officers with clear guidance on evaluating the financial soundness of farm operating plans.
- Allow applicants to use any tax identification number recognized by the Internal Revenue Service, in lieu of citizenship-based eligibility requirements.
- Waive FSA microloan eligibility constraints around state or federal convictions for possession of controlled substances.
- For Direct Farm Ownership Microloans, waive the management experience requirement for Socially Disadvantaged and Economically Distressed applicants if applicants provide a financially sound farm plan.
- Waive collateral and experience requirements for operating microloans of \$10,000 or less.
- Create a micro-operating grant in addition to operating microloans. Many farmers need small amounts of capital, often \$10,000-\$25,000. A micro-grant would be transformative for these operations and could be an important entry point for new USDA customers. Micro-grants should be available regardless of citizenship status.
- Reauthorize and appropriate funding for the Beginning Farmer and Rancher Individual Development Accounts originally authorized in the 2008 farm bill.
- Expand support for “wrap around” capital that combines business technical assistance with affordable financing.
- Ensure that FSA is coordinated with other agencies, such as Rural Development, to address credit, land, and housing access challenges.
- Ensure equitable access to crop insurance for BIPOC farmers.
 - Codify the new Micro Farm program through the RMA to improve access to crop insurance for operations that are diversified, organic, and/or selling in local, regional, and specialty markets.
 - Expand direct marketing prices within the Noninsured Crop Disaster Assistance Program or allow farmers to use their own yields and

- historic pricing data to more equitably serve farmers who sell direct-to-consumer or receive a premium on their crops.
 - Administer NAP as an on-ramp to more holistic risk management programs such as Whole Farm Revenue Protection program and the Micro Farm program.
 - Increase the maximum allowable farm revenue for Socially Disadvantaged and Economically Distressed applicants to the Micro Farm program.
 - Ensure that USDA Approved Insurance Providers are fluent in available insurance products and are actively marketing them consistent with USDA policies, as a condition of approval.
- Invest in incentivizing farm transition and preventing land loss in communities of color.
 - Improve BIPOC access to loans, including low-interest and those not requiring collateral.
 - Work with communities most impacted by heirs' property issues to find innovative solutions that work best for them.
 - Continue investment in the Heirs' Property Relending Program and expand funding eligibility to include administration of program funds by relending entities.
 - Invest in a dedicated source of multi-year funding for technical service providers supporting farmers seeking land access and landowners transitioning out of farm ownership—prioritizing funding for state mediation programs that focus on outreach to underserved farmers and heirs' property landowners.
 - Incentivize farmland transition by creating a federal capital gains tax exclusion for the sale of land to qualified young, BIPOC farmers.
 - Fund training for culturally appropriate technical assistance services through FSA.
 - Continue funding the Farming Opportunities Training and Outreach Grants Program.
 - Create a strategy plan or blueprint designed to be a resource for staff across USDA agencies, to support equitable land transition to this new generation of farmers that will serve across the agency to access agency staff in prioritizing young farmers' land access and tenure.
- Ensure the accessibility and accountability of USDA programs, centering young BIPOC farmers and increasing access for the next generation of farmers as a whole.
 - Ensure USDA land-related programs are accessible to all young, BIPOC farmers specifically, and next generation farmers as a whole, by accommodating eligibility for collective, cooperative, and communal non-family entities, and tracking and publicly reporting demographics data on program participants. As stated in President Biden's Executive Order 13985: Advancing Racial Equity and Support

for Underserved Communities Through the Federal Government, “...lack of data has cascading effects and impedes efforts to measure and advance equity. A first step to promoting equity in Government action is to gather the data necessary to inform that effort.”

- Implement thorough, racial equity-informed evaluation and reporting requirements to not only measure who is benefitting, but to measure program effectiveness in facilitating secure land tenure for young and BIPOC farmers.
- Provide continued funding for cooperative agreements with community-based organizations, such as the NRCS Cooperative Agreements for Racial Justice and Equity.
- Enact H.R. 40, the Commission to Study and Develop Reparation Proposals for African-Americans Act.
- Increase funding for the Local Agriculture Market Program (LAMP) to at least \$75 million per year.
- Prioritize socially disadvantaged farmers and ranchers for conservation technical assistance, CSP, and the Rural Energy for America Program.
- Improve BIPOC access to programs such as SARE program.
- Reform the programs and services provided by the FSA:
 - Eliminate the ineligibility provision for farmers who have had a debt write-down.
 - Eliminate the 7-year graduation requirement for FSA borrowers.
 - Eliminate excessive collateral requirements and facilitate an automatic option for a partial release of the residence from the loan security as the loan is paid down.
 - Reduce the turnaround time for FSA loan approval to meet the market pace.
 - Create a pre-approval mechanism for FSA Direct Farm Ownership.

Policies to Ensure the Safety and Dignity of Food and Farmworkers

- Include the Protect America’s Meatpacking Workers Act (PAMWA) in the next farm bill.
- Appropriate \$500 million for the for the Farm and Food Worker Relief Grant Program to compensate grocery workers for personal protection equipment expenses during the pandemic and other future disasters.
- Fully fund the Supplemental Nutrition Assistance Program (SNAP) program, which is disproportionately used by food system workers due to low wages in those industries.

- Require that the USDA only contract for food procurement with companies that respect workers' rights, pay living wages, provide safe workplaces, and treat their workers with dignity and respect.
- Extend the protections in the Fair Labor Standards Act and the National Labor Relations Act to farmworkers and other currently exempt food workers.
- Entitle all food chain workers to paid sick, vacation, and family leave, affordable childcare, a day of rest, health insurance, and the right to bathroom breaks.
- Ensure the safety of all food chain workers:
 - Increase federal funding for safety oversight for all workers.
 - Provide and improve worker protections from exposures to harmful working conditions, including extreme heat, wildfire smoke, and pesticides.
 - Provide protections for public health emergencies, including personal protective equipment, severance pay, paid sick leave, and healthcare.
- Require the US Comptroller General to submit a report to Congress on racial and ethnic disparities in meat and poultry processing.

Policies to Increase Access to Nutritious Food for All

- Strengthen SNAP and protect the program from cuts or other harmful changes.
- Make the produce prescription portion of the Gus Schumacher Nutrition Incentive Program (GusNIP) permanent;
- Maintain the priority for farm direct retailers and retailers who purchase regionally grown and processed produce;
- Streamline benefit administration and reduce stigma for recipients by codifying the existing practice of allowing states to integrate GusNIP incentives directly onto electronic benefit transfer cards;
- Codify within the legislative language that allowable redemption models include:
 - Any SNAP eligible food for fruits and vegetables—SNAP participants purchase any SNAP eligible food and then receive incentives that are redeemable only for the purchase of fruits or vegetables; and
 - Fruits and vegetables for any SNAP eligible food: SNAP participants purchase fruits or vegetables and then receive incentives that are redeemable for the purchase of any SNAP eligible food.
- Expand funding for training, technical assistance, and program evaluation;
- Reduce the required match for SNAP incentives to no more than 10 percent; and

- Develop a new, separate tier of funding within GusNIP with a minimum grant amount of \$10M for states that are ready to scale programs so that at least 90 cents for every project dollar goes directly to SNAP recipients.
- Reauthorize the Community Food Projects grant program and restore program funding to \$9 million per year;
 - Reduce the match requirement to no more than 10 percent;
 - Authorize the Secretary to waive the match requirement if the Secretary determines a waiver is necessary to more effectively reach an underserved area or population; and
 - Direct USDA to simplify the application and reporting requirements.
- Reauthorize the Healthy Food Financing Initiative
 - In 2021, 13.5 million households in America struggled to provide proper nutrition to themselves and their families because they lack access to fresh and healthy food. The USDA's Healthy Food Financing Initiative (HFFI) helps to link more families with healthy food by providing resources to healthy food retail and food enterprise projects to overcome the higher costs and initial barriers to serving low-access areas. The program currently provides grants and technical assistance to eligible projects.

Local Agriculture Market Program (LAMP)

Improve equity and access to the suite of LAMP subprograms by directing USDA to offer streamlined “turnkey grants” for projects of \$100,000 or less through the Farmers Market and Local Food Promotion Program; provide USDA the authority and direction to prioritize geographic diversity and balance, scale matching funds requirements; provide for limited investment in physical infrastructure and equipment, and increase funding from \$50 million per year to \$75 million.

- Proposed FMPP Turnkey options:
 - Outreach and promotion projects (includes customer facing and vendor recruitment);
 - Farmers market manager staff-time.
 - Vendor training (food safety, nutrition programs, marketing practices etc); and
 - Planning and design projects for new and existing markets (includes community engagement, site designs, permitting, etc.); and
 - Data collection and evaluation.
- Proposed LFPP Turnkey Options:
 - Food hub feasibility study.
 - Value chain coordinator staff-time.
 - Technical assistance (business, grant writing, awards management).
 - Data collection and evaluation; and

- General purpose equipment.
- Provide USDA the authority and direction to prioritize geographic diversity and balance during the application process for FMLFPP to ensure greater geographic diversity among awardees.
- Reduce matching fund requirement from 50 to 25 percent for VAPG applications with an Adjusted Gross Income of \$250,000 or less.
- Allowing for a limited amount of funding to support physical infrastructure and equipment purchases with LAMP subprogram funding as part of larger projects.
- Direct USDA to coordinate between AMS and RD regarding infrastructure and equipment investments and compliance with documentation and monitoring requirements.
- Allow projects focused on SNAP redemption and related systems that don't include SNAP incentives.
- Direct USDA to make value chain coordination and outreach and technical assistance projects specifically authorized Regional Food Systems Partnership Program and Local Food Promotion Program eligible projects.
- Increase funding for LAMP from \$50 million per year to \$75 million per year.
- Increase appropriations authority from \$20 million to \$30 million per year.

Seniors Farmers' Market Nutrition Program

Reauthorize the Seniors Farmer's Market Nutrition Program and funding provision and add the authority to seek discretionary appropriations in addition to mandatory funding.

The Gus Schumacher Nutrition Incentive Program (GusNIP)

- Overall funding for the GusNIP program should be authorized at \$350 million a year or \$3.5 billion over 10 years, including:
 - \$12 million a year for Technical Assistance Hub
 - \$35 million a year for the Produce Prescription Program (PPP)
 - \$50 million for existing grants
 - \$253 million for statewide expansion cooperative agreements
- Matching requirements
 - Reduce matching requirement to 25%
 - Remove or reduce match requirement for pilot size grants.
 - In-kind contributions—Allow in-kind matching for retail establishments including technology and wages for implementing programs.
- Statewide expansion

- Create new tiered grant program/cooperative agreement to ensure more money going to SNAP pockets and not overhead, which would include:
 - Authorizing a new cooperative agreement between FNS, NIFA and SNAP State Agency or a non-profit/local government in partnership with a SNAP State Agency to scale up GusNIP incentives statewide.
 - A minimum of \$10 million a grant (per year) with at least 90% of every project dollar going to SNAP recipients
 - Flexibility to ramp up over the life of the grant to \$10 million and 90% of funds going to SNAP recipients.
 - Agreement Duration – 4-5 years
 - Criteria:
 - Same as other grants
 - Priority for nutrition incentive programs that work in a variety of retail settings, including independent retailers and farmers markets.
 - All cooperative agreements for program expansion must be built on proven program models that have gone through rigorous evaluation.
- Program Eligibility
 - Allow States or non-profits to apply for funding large scale grants.
- Program Priority - Incentives
 - Protect language that prioritizes projects that use direct-to-consumer sales marketing (farmers markets, CSAs, food stands).
- Interagency & Program Coordination
 - FNS & NIFA – add language to improve coordination between agencies on running GusNIP. This can be done through the cooperative agreements for State Expansion

GusNIP Produce Prescription Program (PPP)

Establish two tiers of PPP (50% of the total grant budget go to each tier):

- **Scale Projects**
 - Criteria include demonstrated ability to scale patient reach when delivered through clinical practice and: minimum 300 patient cohorts.
 - Grant size: \$1 million
 - Duration: 12 months or longer
- **Seeding Infrastructure Projects**
 - Priority with-in existing PPP
 - learn previously unknown facts about program design,

- establish or validate best practices, and/or
- establish infrastructure that aids community health centers and independent produce retail outlets.
- Grant Size: \$100,000 to \$400,000.
- Separate the grant review panel so that an entirely different group of reviewers assess GusNIP PPP than do GusNIP nutrition incentive proposals.
- Add a priority for programs that offer a variety of retail settings, including independent grocers, for produce prescription redemption.

Conclusion

In the next food and farm bill, Congress has an opportunity to protect farms, food, and workers against current and future shocks to the food and farm system. The U.S. needs a food and farm bill that protects and elevates small and mid-size farmers—especially new farmers and farmers of color. We encourage Congress to be clear-eyed about the ways in which our current agricultural system is contributing to the climate crisis. Corporate agriculture has taken control our food system, limited farmers' choices, and ignored - and in many cases aggravated - the impact of the climate crisis on workers, and our food, water, and soil.

Small and mid-sized farmers understand that the quality of our environment determines the health and sustainability of our food. Black, Indigenous, and immigrant farmers and farm workers are experts in farming practices that are key to addressing the climate crisis. The next food and farm bill must center the knowledge and needs of communities and workers of color, and lean on their expertise.

We look forward to working together with Congress and the Biden Administration to make these changes a reality in the next food and farm bill. Thank you for taking these policy proposals into consideration.

Sincerely,

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