Field to Market®

The Alliance for Sustainable Agriculture

**Response to USDA Request for Information in Federal Register | Vol. 86, No. 187**
**Climate-Smart Agriculture and Forestry Partnership Program [Docket ID: USDA-2021-0010]**

**Submitted by:** Betsy Hickman, VP, Stakeholder Engagement & Implementation, Field to Market

**Questions Addressed:** 1-8

**Description of Field to Market: The Alliance for Sustainable Agriculture**

Field to Market brings together a diverse group of grower organizations; agribusinesses; food, beverage, apparel, restaurant and retail companies; conservation groups; universities; and public sector partners to define, measure, and advance the sustainability of food, feed, fiber and fuel production in the United States.

As a non-profit, multi-stakeholder initiative, Field to Market seeks to harness the collective action of the agricultural value chain to support resilient ecosystems and enhance farmer livelihoods. For the past 15 years, the Alliance's science-based and outcomes-driven solutions have fostered pre-competitive collaboration to translate science into action and drive collective impact.

With nearly 150 diverse member organizations representing all facets of the food and agriculture system, the Alliance leverages its convening power to unite the value chain in delivering sustainable outcomes for agriculture. Collectively, Field to Market members employing more than 5 million people and representing combined revenues totaling over $1.5 trillion.

**Description of any public-private partnership with Federal, State, tribal, territorial, or local governments within the past 3 years that are relevant to this document:**

- *Field to Market has a Memorandum of Understanding with USDA Natural Resource Conservation Service (NRCS) to ensure alignment between USDA NRCS tools and models with the Fieldprint Platform, including integrations of wind erosion models, STEP water quality model, and COMET-Planner.*
- *Field to Market has a Cooperative Funding Agreement with USDA NRCS to pursue interoperability between the NRCS Conservation Application Ranking Tool (CART) and Field to Market's Fieldprint® Platform to explore opportunities to expedite conservation planning and create opportunities for farmers enrolled in supply chain projects greater access to federal cost-share programs.*
- *Field to Market provides in-kind support to active Regional Conservation Partnership Program (RCPP) projects including Precision Conservation Management and Midwest Agricultural Water Quality Partnership. We have also provided historical support to a variety of RCPP projects led by members of the Alliance, include the Rice Stewardship Partnership.*

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Field to Market®
The Alliance for Sustainable Agriculture

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**RE: Field to Market Response USDA Request for Information in Federal Register | Vol. 86, No. 187 | Climate-Smart Agriculture and Forestry Partnership Program [Docket ID: USDA-2021-0010]**

Dear Mr. Ibarra,

Thank you for providing the opportunity to comment on USDA's Climate-Smart Agriculture and Forestry Partnership Program. Since November 2006, Field to Market: The Alliance for Sustainable Agriculture has championed a pre-competitive, multi-stakeholder approach to standardizing a science-driven and outcomes-based framework for defining, measuring and improving the sustainability of commodity crop production in the United States.

Field to Market is uniquely positioned to address the questions raised by Department in how to best leverage private-sector demand in scaling adoption of climate-smart agriculture practices and strengthening and expanding markets for U.S. farmers. With nearly 150 diverse member organizations representing all facets of the food and agriculture system, the Alliance has wrestled with many of the identified barriers and developed solutions for standardizing both measurement and allocation of climate impact across the value chain.

As a trusted resource and partner for stakeholders across the value chain, Field to Market's pre-competitive suite of sustainability metrics and process-based standard underpin more than 70 active member-led projects enrolled in Field to Market's Continuous Improvement Accelerator, These projects collectively engage 4.5 million acres across 34 states in pursuing measurable improvement in sustainability outcomes, including a predominant focus on driving greenhouse gas (GHG) emissions reductions and sequestering soil carbon.

With fifteen years of shared learnings, the Alliance is eager to offer solutions and insights to inform the potential development of USDA's Climate-Smart Partnership Program and explore opportunities for deeper collaboration with USDA to design an effective and fruitful public-private partnership to scale climate-smart agriculture. As Program priorities and design elements

become clearer, Field to Market's membership looks forward to the opportunity of testing novel approaches and opportunities for greater scale and impact by harnessing the power of public-private partnership to achieve more than what either the public or private sectors can accomplish alone.

Many of the comments below are a result of direct conversations with farmers, agribusiness companies, brands, retailers, universities, and public-sector partners during the Alliance's two-week member comment period. Led by Field to Market's Board of Directors, we solicited input from our diverse members who understand the unique challenges and opportunities of delivering change at scale.

Field to Market encourages USDA to consider the following recommendations to shape the priorities and design of the Climate-Smart Partnership Program and to inform how the federal government can effectively partner with the private sector through voluntary, supply chain sustainability initiatives like Field to Market to support farmers in rapidly adopting climate-friendly practices. Field to Market stands ready to partner with the USDA in its continued exploration of this Partnership Program.

*Please note that Field to Market's program is national in scope and inclusive of alfalfa, barley, corn, cotton, peanuts, potatoes, rice, sorghum, soybeans, sugar beets and wheat. The Alliance seeks a coordinated and comprehensive approach to advance sustainability outcomes across commodity supply chains for food, feed, fiber and fuel. The following recommendations are relevant to opportunities across these commodities and supply chains.*

1. **How would existing private sector and state compliance markets for carbon offsets be impacted from this potential federal program?**

A well-designed public-private partnership program to encourage adoption of climate-smart agriculture practices would be beneficial for voluntary, market-driven solutions focused on advancing sustainable outcomes within the food and agriculture value chain if responsive to the challenges and opportunities outlined below.

- **Remove Barriers to Adoption**: One of the greatest barriers to scaling climate-smart agriculture is the agronomic and financial risk farmers face when transitioning to climate-smart agriculture practices that require up-front investment and added production costs. One of the clearest opportunities to improve scalability of climate-smart agriculture is for this partnership program to **explore opportunities for robustly supporting farmers in de-risking adoption of climate-smart practices through robust technical assistance, financial assistance** (*e.g.,* federal cost-share, innovative blended finance mechanisms and risk management products), and **peer-to-peer learning networks**.

- **Foster Greater Public-Private Collaboration**: Clear opportunities exist to leverage private-sector demand to foster greater public-private collaboration. **The Department should create opportunities to test and pilot specific program design elements with the private sector, prioritizing opportunities to collaborate with pre-competitive, multi-stakeholder initiatives that can offer a depth of perspectives and feedback to inform successful public-private partnerships in scaling climate-smart agriculture practices.** Field to Market would encourage USDA to carefully consider key assumptions related to private-sector demand and market-based incentives to ensure durability and efficacy of the program's approach. Solutions that balance supporting new farmers in adopting practices as well as expanding the amount of acreage reached should be prioritized.

- **Pursue Greatest Areas of Impact:** There is a **clear opportunity for public-private collaboration to drive adoption of climate-smart practices that result in emissions reductions that are both immediate and permanent while also providing farmers the necessary financial and technical assistance to scale adoption of climate-smart practices that improve the health and resilience of our nation's soils.** Consideration should be given to support farmers in building long-term resilience of their soils against climate shocks, while also working to capture immediate climate-benefits from reducing nitrous oxide and methane emissions.

  Many climate-smart production systems are profitable, but technical assistance and upfront investments, and time are required to transition to systems that can lead to emissions reductions (*e.g.*, pairing precision agriculture and advanced nutrient stewardship with no-till and/or cover crops to optimize fertilizer application to reduce nitrous oxide emissions; implementing alternate wetting and drying in rice production to reduce methane emissions; etc.). Opportunity exists for USDA to explore stacked funding alongside private sector investments to scale adoption of in-field climate-smart practices to realize these benefits. An additional opportunity for USDA to explore is how to maximize climate outcomes by providing funding for what is difficult for private sector entities to fund due to supply chain carbon accounting constraints—such as edge of field practices and taking marginal lands and pivot corners out of production, which offers important climate benefits but cannot be counted towards ambitious, science-based emissions reduction targets companies have set to align with the Paris Agreement.

- **Build Program Based on Aligned Guiding Principles:** Any efforts to define a climate-smart commodity and determine the priorities and design of the Climate-Smart Partnership Program should be done with careful consideration and intent. There is not clear consensus across Field to Market members on the role USDA should play in any such definition or determination. In aligning diverse interests and needs across the value chain, Field to Market has championed an outcomes-based and science-driven approach to measuring, accounting and allocating sustainability impact. These solutions have been shaped through a multi-stakeholder, consensus-driven process informed by key guiding principles.

  **We offer the aligned set of guiding principles that informed Field to Market's voluntary, market-driven approach to advancing sustainable outcomes for your consideration as you design the Program**:
  - Engage the full supply chain – Strive for balanced representation across the value chain, including farmers, agribusiness, brands/retail, civil society and academia in creating definitions, establishing priorities and designing Program requirements
  - Transparency - Encourage transparency around metrics and models to ensure consistency
  - Science-Based – Ensure credibility of the approach and resulting claims by grounding approach in peer-reviewed science
  - Pre-competitive – Champion a pre-competitive approach to measurement
  - Outcomes Focused – Give farmers the freedom to innovate by focusing Program on desired outcomes vs prescriptive approach
  - Continuous Improvement – The design of the Program should support all producers in pursuing climate benefits, focusing on continuous improvement rather than establishing specific thresholds to move the entire commodity forward in climate performance

- Shared Value – Careful consideration should be given to ensure value is distributed equally across sectors within the supply chain, with a focus towards clear benefits deriving to farmers

- **Provide Clarity & Set the Rules of the Road**: An opportunity for USDA to explore its role as "referee"—**ensuring a fair and level playing field by establishing principles to drive uniformity in how climate benefits are measured, accounted and allocated**. Field to Market recommends that USDA create a process for providing formal recognition to programs that comply with established principles. Creating uniformity and providing a set of "rules of the road" would help eliminate confusion for farmers and ensure credibility for agriculture's role in providing nature-based climate solutions.

  With the proliferation of voluntary ecosystem service markets across U.S. agriculture, there is a role for guidance and transparency on pre-competitive approaches to avoid double counting or double claiming across programs. There are already examples of farmers being approached by multiple carbon programs and supply chain sustainability initiatives without clear guidance on where participation is mutually exclusive. Moreover, the competing demands of Scope 1 (*Offset Credits*) and Scope 3 (*Supply Chain Environmental Attributes*) for farmer attention and enrollment presents an ever-present challenge without clear resolution.

  An effective federal program must carefully consider program design to prevent intensifying these challenges, even unintentionally. The integrity of climate benefits from the food and agriculture system depends upon an assurance that outcomes are real and permanent and that the same reductions or improvements from any farm are not claimed by more than one brand or retailer. It is unfair to leave this responsibility and liability entirely on the shoulders of farmers to read through the fine print of carbon and/or supply chain contracts. Similarly, any opportunities of leveraging private-sector demand at scale will be quickly diminished if food and agriculture companies must continue to pay for what they invest in today—independent technical assistance, peer networking support, and up-front, practice cost-share payments *while also* paying for outcomes-based carbon payments.

**2. In order to expand markets, what should the scope of the Climate-Smart Agriculture and Forestry Partnership Program be, including in terms of geography, scale, project focus, and project activities supported?**

While the Alliance acknowledges the importance of USDA's approach to develop a Climate-Smart Partnership Program, inclusive of forestry, livestock, dairy, specialty crop and commodity crop production, we would encourage USDA to consider opportunities to leverage the maturity of solutions and resources created through the collective investment of Field to Market's membership over the past fifteen year to create shared learning and inform USDA's approach to scaling climate-smart practices in commodity crop production.

Opportunities exist for USDA to encourage private sector collaboration to support farmers in scaling climate-smart farming practices across diverse crop-rotations. Eligible project focus and activities should create opportunities to harness corporate sustainability goals and science-based emissions reduction targets for key ingredients and raw materials, while also incentivizing solutions that support farmers in pursuing climate-smart practices across the full crop rotation and foster pre-competitive collaboration in key supply sheds and critical conservation areas. While the Program should reward projects for delivering climate solutions at scale, the public

project registry of Field to Market's Continuous Improvement Accelerator highlights a diversity of need with regard to project size and scale.

**3. In order to expand markets, what types of CSAF project activities should be eligible for funding through the Climate-Smart Agriculture and Forestry Partnership Program?**

Field to Market recommends that USDA utilize the Climate-Smart Partnership Program to test and pilot a variety of innovative approaches to leveraging private sector demand to scale adoption of climate-smart practices and create opportunities for new revenue and/or greater market access for U.S. farmers. To encourage a collaborative approach to setting Program priorities and design, suggested approaches include:

- **Standardized Supply Chain Measurement, Accounting and Allocation of Climate-Benefits within U.S. Agriculture**

  Program funding should prioritize projects that can clearly demonstrate a consistent and standardized approach to measuring, accounting and allocating climate-impacts from U.S. agricultural production, recognizing varying levels of maturity across the industry sectors. For instance, the sustainability metrics and protocols of the process-based standard that underpins Field to Market's Continuous Improvement Accelerator could offer a springboard for the Program to accelerate climate-smart practice adoption in commodity agriculture.

  Leveraging 15 years of shared learnings and solutions, the Program could seek to incentivize collective action and encourage greater pre-competitive collaboration across diverse crop rotations and within key supply sheds, while not having to re-invent the wheel with regard to designing measurement frameworks, supply chain accounting methodologies and frameworks to allocate impact amongst co-products/by-products and multiple project partners. Similarly, the Program could work to adapt and tailor learnings from food, beverage and apparel supply chains to advance nuanced approaches for sustainable feed and biofuel production, recognizing increasing levels of complexity within those supply chains require greater pre-competitive collaboration to advance impact.

  Field to Market encourages USDA to consider a variety of approaches to improve greater transparency of climate impacts with commodity supply chains without placing undue financial burden on a system that was built for efficiency and economies of scale. To that end, projects that support clear supply chain accounting methodologies, such as mass balance, and offer clear requirements on how to credibly allocate impact should be considered alongside more traditional approaches like book-and-claim certificates.

- **Advancing Innovative Finance & Leveraging Private Capital**

  As a key pillar within Field to Market's 2022-2024 Strategic Plan, strengthening capacity across the value chain to deploy effective incentive strategies to support farmers in scaling conservation adoption by addressing agronomic and financial risk of transition, including innovative finance solutions to scale climate-smart agriculture practices. Many climate-smart production systems are profitable, but time and upfront investments are required to transition to such systems. Farmers need access to appropriate finance that both supports their ability to overcome transition barriers and incorporates the long-term financial value of climate-smart agriculture practices and systems. Program funding could be blended with

private capital in multiple ways, including but not limited to interest rate buy-downs, subordinated debt, guarantees, and more.

Such funding should not be limited to solely the conservation expense (*e.g.,* cover crop seed, conservation-related equipment) but should be offered to any innovative financial product that works to de-risk the practice and achieve and measure beneficial climate outcomes (*e.g.*, a transition loan product that replaces a traditional operating loan for a farm in adopting climate-smart practices). As with all pilots, a key requirement of such funds should be to measure both environmental and economic performance of the project and the producer, commodity or financial product involved. This is a critical step to achieve the goal of launching financial products that incorporate the long-term financial value of climate-smart agriculture practices and systems without continued government support.

4. **In order to expand markets, what entities should be eligible to apply for funding through the Climate-Smart Agriculture and Forestry Partnership Program?**

   Where possible, we would encourage the Program to encourage broad eligibility to apply for funding, including producer associations; non-profit organizations with a history of working collaboratively with producers; agribusiness companies with capabilities to provide agronomic advice, technical assistance alongside climate-smart practice delivery; academic institutions; conservation districts; multi-stakeholder initiatives; and supply chain collaboratives with strong downstream demand/commitment to scale climate-smart agriculture.

5. **In order to expand markets, what criteria should be used to evaluate project proposals for receiving funding through the Climate-Smart Agriculture and Forestry Partnership Program?**

Pilot projects that receive funding must be credible with quantifiable climate impacts and have potential to scale. Some recommended criteria should include

- Quality of addressing the broad suite of enabling conditions (*e.g.*, financial, cultural AND technical assistance) needed to implement climate-smart agriculture
- Ability to demonstrate a pre-competitive and multi-stakeholder approach in the project's design and delivery
- Capacity to extrapolate project into increasing the long-term resilience of farming, not just short term GHG mitigation. Explicit evaluation should be given to the economics and resilience benefits of project implementation over time and in response to climate shocks.
- Preference for projects that can support farmers and the supply chain in reaching beyond the farm and individual ingredient supply chain to leverage impact at a landscape level, supporting farmers across diverse crop rotations and fostering pre-competitive collaboration within key supply sheds or critical conservation areas
- Ability to efficiently deliver environmental outcomes at a price point that offers the greatest return on investment for farmers
- Demonstrated capabilities to direct greatest majority of funding to farmer benefit (*e.g.*, financial incentives and technical assistance) vs project administration and overhead
- Benefit to early adopters and ability to leverage role as champions to enroll peer set
- Past performance and demonstrated capability to support projects and ensure success.

- A clear plan for how to successfully operate in regions where there are other programs or initiatives. Interoperability and pre-competitive collaboration at a landscape scale are critical to scaling climate-smart agriculture benefits.
- Preference for projects with plans to ensure equitable distribution of funds to include preference for historically underserved populations (including BIPOC, veterans, and new/beginning farmers).
- Ability to demonstrate co-benefits to other environmental outcomes, rewarding producers for multiple ecosystem services and ability to address locally relevant natural resource concerns such as water quality and biodiversity.

**6. In order to expand markets, which CSAF practices should be eligible for inclusion?**

**a. What systems for quantification and key metrics should be used to assess the benefits of projects funded through the Climate-Smart Agriculture and Forestry Partnership Program?**

Key metrics for greenhouse gas emissions quantification of commodity crop production include – emissions from energy use on farm; life-cycle emissions from products used on-farm (fertilizer and chemicals); Soil nitrous oxide ($N_2O$) emissions; emissions from residue burning; and methane ($CH_4$) emissions (*rice only*). Field to Market's GHG Emissions metric includes all of these elements for the 11 commodity crops within our program (alfalfa, barley, corn, cotton, peanuts, potatoes, rice, sorghum, soybeans, sugar beets and wheat).

USDA NRCS has several simple tools that are effective at assessing the soil carbon benefits of climate smart practices that Field to Market has adopted within the Fieldprint Platform. These tools include the Soil Conditioning Index, which provides a clear directional indicator of whether carbon is likely increasing based on soil disturbance and management, and the COMET-Planner tool which allows quick assessment of the potential quantity of carbon stored based on a practice change.

Field to Market recommends that USDA preference an outcomes-based approach to quantifying and assessing the climate-benefits of projects funded through the Program. While a suite of climate-smart practices known to improve those outcomes can be encouraged, it is essential that farmers maintain the freedom to innovate and select the approaches that work best for their growing region, climatic conditions and operation. To streamline and standardize measurement and quantification, USDA should consider a set of principles against which accepted metrics and quantification approaches could be recognized.

**b. What should the quantification, monitoring, reporting, and verification requirements for projects funded through the Climate-Smart Agriculture and Forestry Partnership Program be?**

Assurance of practice implementation and modeled outcomes should be required. To encourage scalability and feasibility of implementation, third party assurance or spot auditing should be accessible.

**c. What types of systems should be used or supported to track participation, implementation, and potential benefits generated?**

Field to Market encourages USDA to look to industry standards for sampling, assurance and verification protocols. Field to Market's process-based standard that underpins the Continuous Improvement Accelerator offers U.S. row crop agriculture with the following resources to support evaluation of farmer participation, implementation and potential benefits generated:

- Assurance Principles: Field to Market's Assurance Principles provide a framework for Field to Market members for the selection and provision of different levels of assurance in meeting Field to Market standards.
- Sampling Framework: A framework enabled by Field to Market to aid in designing a project where data is collected from a representative sample of growers over time to be used in reporting results about the whole. The framework specifies that any outreach and technical support must reach the full population included in the project, even where only a sample is entering data and quantifying outcomes.
- Impact Claims Verification Protocol: Impact claims quantify actual sustained improvements or reductions against Field to Market's outcomes-based metrics, demonstrating an improved trend line and/or assessing performance against a Fieldprint Project's three-year benchmark. The protocol provides clear guidance on supply chain accounting methodologies, impact allocation frameworks across project partners and across commodity co-products (*e.g.*, soybean meal and soybean oil).

**d. What types of data and metrics should be collected and reported to determine project success and GHG benefits delivered? How should the data and metrics be analyzed to inform future decisions?**

Two possible methods could be utilized to determine project success: 1) track adoption of climate smart practices and document change in practices on each acre, with credit accruing for increased acreage under approved practices or 2) estimating emissions avoided or carbon sequestered using quantitative metrics or models. To leverage private-sector demand, a stepwise approach should be considered to support company's desire to quantify emissions reductions to deliver against science-based targets.

Additional data will help inform future decisions and programs such as:

1. Longevity of any practice change, are the changes sustainable or ephemeral
2. Economic impact on the farm operation
3. Additional changes in management that accompany climate-smart practice adoption
4. Farmer perception of programs and willingness to participate

**7. How should ownership of potential GHG benefits that may be generated be managed?**

Field to Market encourages USDA to review the carbon accounting frameworks of the GHG Protocol and Science-Based Targets Initiative when determining how the ownership of potential GHG benefits that may be generated should be managed and allocated. All parties who are part of a project should be able to claim benefits, with important considerations agreed upon upfront on how similar entities within a sector of the supply chain agree to allocate impact (*e.g.*, percentage split or allocated based on level of investment). Several of our members follow these frameworks and their involvement in any USDA program would need to align with the framework requirements.

Field to Market aligns with the guidance offered by the Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Supplement to the GHG Protocol Corporate Accounting and Reporting Standard), which provides guidance to avoid double claiming of benefits within each link of the value chain.

Today in supply chain sustainability projects, climate benefits can accrue to multiple levels of the supply chain. In addition, projects employ varying approaches to support and reward farmers for adopting climate-smart practices—from cost-share programs to warranties to outcomes-based payments.

Shared ownership of GHG benefits generated within supply chain sustainability projects is allowed if there is not double counting within an equivalent part of the supply chain. For example, if a project involves a State Commodity Organization, USDA, Ag Retailer, Grain Processor, Food Brand and Retailer and supports participating farmers in adopting practices that generate 100 tons of soil carbon, all entities can report 100 tons. However, if another food company joined the project and invested equally to the first food company, each could only claim 50 tons because the two companies reside in an equivalent part of the supply chain.

**8. How can USDA ensure that partnership projects are equitable and strive to include a wide range of landowners and producers?**

**a. How can the Climate-Smart Agriculture and Forestry Partnership Program include early adopters of CSAF practices?**

USDA should explore ways in which early-adopters can be compensated for the historical carbon reductions they have already made. Dealing with issues of fairness and equity for the benefits already provided by early adopters is a difficult problem for the private sector to address, but one in which the USDA could play an important role. In addition, early adopters should be eligible for inclusion based on continuous carbon reductions they provide. Consider program design elements that reward early adopters for their stewardship and incentivize their essential role in sharing lessons learned and supporting peers in advancing on similar journey through peer mentoring. Early adopters should be compensated for sharing their expertise and experience with newer adopters that will be compensated for their carbon reductions and removals.

**b. How can the Climate-Smart Agriculture and Forestry Partnership Program be designed to ensure that benefits flow to historically underserved producers?**

Design the Program to eliminate barriers for enrollment of small farm operations and highlight land control solutions that allow operators to be eligible for work completed on rented lands. Tenants often drive practices and need to accrue environmental value for the climate-smart practices they implement. Program design elements that create opportunities for operators to capture value from climate-smart practices will ensure equity and catalyze adoption. In addition, streamlined eligibility determinations, a major barrier for farmers, that reduce the amount of paperwork and reporting required to access funding is also key.

**c. How can the Climate-Smart Agriculture and Forestry Partnership Program be designed to ensure that benefits flow to historically underserved communities?**

Consider the successful model of the alternative funding arrangement process for the Regional Conservation Partnership Program, which enables local trusted advisors, regional implementation partners and non-profit organizations to administer funds to expand the reach and accessibility of the Program.

**d. How can the Climate-Smart Agriculture and Forestry Partnership Program be designed to ensure that benefits are provided to producers?**

The Program should be designed to reward projects that are able to efficiently deliver environmental outcomes at a price point that offers the greatest return on investment for farmers. Potential solutions could include setting minimum percentages for funding use to ensure the majority of funds are driven to producers. However, it is essential that the Program also provides provisions to ensure the required technical assistance needed to support farmers in delivering the change to deliver successful outcomes.

Thank you for the opportunity to provide input on USDA's Climate-Smart Partnership Program. We are happy to answer questions related to any of these comments, and we look forward to continuing a longstanding and constructive partnership between USDA and Field to Market as we advance our shared goals for U.S. agriculture.

Best regards,

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