

Food Fix & Rodale Institute: Addressing the Climate-Smart Agriculture and Forestry (CSAF) Partnership Program

Offering solutions in the context of our nation's broken food system

The Food Fix Campaign and Rodale Institute wish to take this opportunity to jointly comment on the Climate-Smart Agriculture and Forestry (CSAF) Partnership Program in the context of our nation's broken food system. Drawing on our experience in functional medicine as well as regenerative and organic agriculture, we offer these comments and the solutions proposed below in the hope of aiding the critically important initiatives being considered by the U.S. Department of Agriculture (USDA).

The Climate-Smart Agriculture and Forestry Partnership Program is of such critical importance. CSAF's focus on agricultural methods that reduce greenhouse gas emissions and sequester carbon are important in their own right, but they also have the power to significantly expand access to healthy and nutritious food in all communities. This linkage is why the Food Fix Campaign and Rodale Institute have come together to jointly submit this comment for consideration. Specifically, we wish to focus on how CSAF partnership projects can include a wide range of landowners and producers.

Over the past half century, Americans have faced a growing crisis of chronic conditions, including obesity, diabetes and heart disease. These conditions have reduced quality of life and led to suffering, premature deaths and rising health care costs. While policymakers, experts, health care providers and communities have tested many ways to address chronic conditions, these efforts have failed so far to adequately reverse these trends, which have implications for our population, health care system, national security, and the entire economy.

Indeed, the tragic impact of the COVID-19 pandemic in the United States was greatly exacerbated by the chronic disease epidemic. According to the Centers for Disease Control and Prevention (CDC) and other authorities, most virus victims had at least one chronic condition, and many suffered from multiple chronic diseases. Consequently, the CDC has concluded that adults with chronic conditions such as heart disease, diabetes, stroke or cerebrovascular disease, and obesity or overweight, are more likely to get severely ill or die from COVID-19.

While there are multiple causes for the growth in chronic disease in the U.S., the CDC cites poor nutrition as a major risk factor. In fact, a CDC-sponsored publication on chronic conditions determined "limited access to nutritious food" was a key factor in COVID-19's impact in the U.S. Put another way, our broken food system is contributing to the burden of chronic conditions, and, in turn, to COVID-19's harrowing case and death counts.

Meanwhile, our nation stands at an agricultural crossroads. Farm practices adopted following World War II have achieved tremendous progress in addressing world hunger. Unfortunately, these practices also unintentionally contributed to the depletion of food nutrients, record levels of farm bankruptcies, and a wide variety of environmental impacts that endanger agricultural sustainability.

The industrialized methods used throughout the U.S. and the world feature concentrated usage of chemical inputs, such as pesticides and fertilizers. While, in the past, these inputs increased yields, they also destroyed soil microbes and reduced soil fertility, causing massive depletion of freshwater resources, biodiversity, and topsoil, resulting in dried-out land that emits water and carbon dioxide, reduces agricultural yields, and increases the risk of drought and desertification.

Further, scientific analysis has documented the presence in our bodies of the chemical inputs widely used in U.S. agriculture. These industrial chemicals have also been linked to the production of less-healthy processed foods which today comprise an estimated 60 percent of the typical American's diet, resulting in increased risk of cancer, birth defects, behavioral maladies, and premature death.

To be successful, efforts to fix our broken food system and heal the planet must reflect the inextricable linkage between these twin objectives. After all, the health of all Americans depends on adequate nutrition, and the production of nutritious foods is promoted by sustainable, climatesmart agricultural methods such as Regenerative and Organic Agriculture (ROA). ROA methods include cover crops, rotational cropping and grazing, reduced tillage, and elimination of chemicals and synthetics, all of which are integral to combating climate change.

Evidence to support an ROA-first approach to food policy is buttressed by the 2019 report of the United Nations International Panel on Climate Change, which found that conventional agriculture is responsible for *nearly a quarter* (24%) of all global greenhouse gas emissions. Making even a dent in our climate crisis means tackling the root causes of climate change, and ROA can be a game changer for feeding our planet in a more sustainable way.

Regenerative and organic crop and pasture management substantially draws down annual emissions by pulling carbon from the atmosphere and storing it in the soil, making the system a very efficient and effective model. For example, ROA methods for grazing management enable livestock to increase carbon sequestered in the soil to a degree that more than offsets their greenhouse gas emissions. Similarly, ROA methods in the farming of fruits and vegetables regenerate ecosystems, restore biodiversity above and below ground, and produce crop yields that can exceed conventional yields, enabling the food supply and its nutritional value to rise in tandem while reducing demands on irrigation/water systems.

Unfortunately, widespread use of ROA methods is unintentionally obstructed by a different area of focus within the U.S. Department of Agriculture (USDA): crop insurance.

Established following the Dust Bowl of the 1930s and expanded since, the U.S. crop insurance program is operated by the Federal Crop Insurance Corporation (FCIC), which is wholly owned by the federal government and managed by USDA's Risk Management Agency (RMA). RMA oversees 14 private sector insurance companies, which issue more than one million policies covering nearly 375 million acres of U.S. farm and ranch land. Under the program, participating farmers receive compensation when farms are ravaged by disasters such as fires, storms, and drought. Indemnity payments are also made to farmers when their yields fall below expectations or if oversupply drives down the prices they can collect. And all of this is underwritten by taxpayer funded subsidies, which help farmers purchase crop insurance at an annual cost to taxpayers of nearly \$10 billion.

That's the good news. The bad news is crop insurance is impeding widespread adoption of climate-smart agricultural methods.

Today's crop insurance policies provide no incentive to farmers who use ROA methods, such as cover crops and reduced tilling. In fact, the premiums they are charged are not discounted, even though the risk of droughts and flooding is substantially lower on ROA land. Likewise, today's policies do not incentivize farmers to use ROA methods, even though they significantly stabilize yields from season to season. Instead, the crop insurance program effectively underwrites conventional intensive farming, causing tremendous harm to topsoil, waterways, the climate, population health, and – most paradoxically – the long-term financial health of farmers themselves.

As a result, we urge the USDA to include in its CSAF Partnership Program a fundamental rethinking of crop insurance policies. There are many opportunities for improvement, including: directing the Risk Management Agency to develop climate smart crop insurance policies, eliminating disincentives for climate smart agriculture such as coverage of organic crops at less 5 than their value, and providing premium discounts to farmers who qualify for use of those policies by engaging in specified climate smart ag practices, including but not limited to ROA methods.

In closing, we acknowledge that crop insurance is far from being the most headline grabbing aspect of USDA's broad portfolio. But the fact that most producers already rely on crop insurance coverage makes it an unparalleled tool for effecting sweeping change. If climate-smart policies were developed by RMA and made available to America's farmers and ranchers, this single step could do more than any other to modernize agricultural practices, improve the nutritional content of food, and foster unprecedented repair of the environment.

Consistent with the question posed by USDA, we also believe these important advances lend themselves to being undertaken in a manner that is both equitable and includes a wide range of landowners and producers. Historically, successful reform efforts worked because they involved and appealed to a broad community of stakeholders. Both levers are available here, since the reforms proposed above would reach and positively impact farmers, ranchers, and all other links in the chain from farm to fork. And since we believe our quest for a healthier people and planet depends on them all, we urge Secretary Vilsack to give urgent consideration to crop insurance reform.

Thank you for this opportunity to comment.