



The Link Between Grain and Goodness

April 29, 2021

Mr. William Hohenstein
Director
Office of Energy and Environmental Policy
U.S. Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

Re: Docket No. USDA-2021-0003

Dear Mr. Hohenstein:

On behalf of our nation's grain millers, the North American Millers' Association (NAMA) is pleased to submit comments regarding the request for public comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad (Federal Register Volume 86, Number 14403 (Tuesday, March 16, 2021) Pages 14403-14404).

NAMA represents millers of wheat, corn, oats, and rye across the continental United States, Puerto Rico, and Canada. Our members take raw grain and, through grinding and crushing, create flour and other products that are used to make favorite foods, such as bread, cereals, pasta, cookies, cakes, and snack foods. As the link between producers and final products, our members are interested in being part of the solution in prioritizing climate change mitigation and creating a more sustainable future. We are excited to see an "all of the above" approach from USDA and look forward to sharing our ideas. Specifically, millers would like to see USDA consider creating incentives for growers so they can make decisions that make scientific and economic sense and develop a strong standard around the development of carbon markets.

While farmers can plant cover crops that benefit their soil as well as the broader ecosystem, current regulations limit the farmer's use of that crop. Both wheat and oats provide tremendous benefits to the soil when added into a crop rotation. The Field to Market National Indicators Report found that wheat's environmental impact improved between 1980-2015 across all five categories of environmental indicators, including energy use, greenhouse gas emissions, irrigation water use, land use, and soil conservation.¹ According to the USDA Natural Resources Conservation Service (NRCS), both wheat and oats, when used as part of a 3 or 4-year rotation, have been shown to improve soil health, reduce erosion potential, and increase yields. NRCS has been active in promoting soil health conservation improving activities, such as adding a third or more crop like oats into a rotation. However, NRCS notes that this shift can be difficult for farmers in part because of the market potential for small crops.² That being said, data show

¹Field to Market: The Alliance for Sustainable Agriculture, 2016. Environmental and Socioeconomic Indicators for Measuring Outcomes of On Farm Agricultural Production in the United States (Third Edition). ISBN: 978-0-692-81902-9.

² "ISU, Conservation Groups Studying Extended Crop Rotations." Natural Resources Conservation Service. <https://www.nrcs.usda.gov/wps/portal/nrcs/ia/newsroom/features/71e31505-9887-4e66-bab4-9ced624da178/>.

that oats have a growing role in the American diet with consumption increasing over the years while U.S. production has gradually decreased.³ In order to address this, USDA Agricultural Research Service (ARS) has been funded by Congress to conduct genetic oat research aimed at overall oat crop improvement, including improving disease resistance and yield. Incentivizing growing wheat and oats not only benefits the environment, but can add to a farmer's economic stability. Without proper incentives, USDA essentially disincentivizes farmers from growing crops that may have substantial benefits to overall soil health and biodiversity. We recommend that USDA consider creating incentives for growers who increase the length of their rotation for increased biodiversity through NRCS or other programs. USDA can also play a role in enhancing soil health by funding plant breeding projects for fall planted crops like wheat and oat.

Additionally, to date there are no specific standards for the carbon markets that exist for every participant to abide by, resulting in multiple companies developing their own credits verified under varying rules. This has created a concern among both private companies and farmers. USDA should develop a set standard for any voluntary carbon markets so that all those involved are meeting the same requirements and know what they can expect from various markets. Creating standards will result in increased confidence in these markets, which in turn could increase enrollment, ultimately helping to reach the longer term goal of reducing carbon emissions.

Lastly, we appreciate that USDA has created opportunities for public-private partnerships for conservation through the Regional Conservation Partnership Program (RCPP). Unfortunately, institutional capacity can be a hindrance for smaller crops to access program dollars, specifically the staffing needed for the coordination, planning, application, and execution of projects is not readily available. It would be appropriate for USDA to help match potential partners for specific opportunities via RCPP or Conservation Innovation Grants that could demonstrate outcomes to a broader audience.

We value USDA's engagement with the nation's agriculture community in its efforts to mitigate climate change. As the link between grain and goodness, our members look forward to partnering with the department in the pursuit of a healthier ecosystem.

Sincerely,



Jane DeMarchi
President
North American Millers' Association

³ "National Statistics for Oats." USDA National Agricultural Statistics Service.
https://www.nass.usda.gov/Statistics_by_Subject/result.php?57954247-DAF6-3583-9A97-083E07E6D866
§or=CROPS&group=FIELD+CROPS&comm=OATS.