



November 1, 2021

Commodity Credit Corporation
U.S. Department of Agriculture
1400 Independence Ave SW
Washington, D.C. 20250

Re: Docket No: USDA-2021-0010

To whom it may concern:

On behalf of our nation's grain millers, the North American Millers' Association (NAMA) is pleased to submit comments regarding the *Request for Information: Climate-Smart Agriculture and Forestry Partnership Program* (Federal Register Volume 86, Number 54149 (Thursday, September 30, 2021) Pages 54149-54152).

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, tortillas, cookies, cakes, and snack foods. As the link between producers and final products, our members will be part of any approach to mitigating climate change through sustainable agriculture. We look forward to partnering with USDA on this endeavor.

RFI Question #3

There is an opportunity for both low carbon commodities and carbon market credits. Food production and agriculture as a whole can take advantage of and leverage low carbon commodities to reduce carbon footprints through insetting within the supply chain. Carbon market credits provide opportunities for both farmers and companies outside of the agriculture supply chain. Growers have the opportunity through increased revenue generated by selling carbon credits to companies that do not have the opportunity to offset emissions through their supply chain.

Standardization through the involvement of USDA is integral to the success of low carbon commodities and carbon market credits. Standardization will improve integrity within the marketplace, providing reassurance to consumers that low carbon claims are valid and translatable across industries and sectors. To date, there are no specific standards for the carbon markets that exist for every participant to abide by, resulting in multiple entities developing their own credits verified under varying rules. This has created uncertainty for both private companies and farmers. USDA should develop a set of standards for any voluntary carbon markets so that all those involved are meeting the same objectives and know what benefits will accrue

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to which practices. Specifically, millers support activities that test and evaluate standardized protocols that define eligible climate-smart agriculture practices, quantification methodologies, and verification practices, with an emphasis on minimizing transaction costs and operating at scale, which is imperative for our members. 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.

RFI Question #4

It would be beneficial if these programs were structured in a way that many different organizations, grower groups, research institutions, and individual farmers have the ability to apply for programs. This could provide greater opportunity for more programs and sector development and allow industry and grower groups to assist farmers in marketplace development and execution.

RFI Question #5

Millers believe USDA should not establish a single payment per ton of GHG generated through partnership projects as part of the project payment structure. Instead, USDA should evaluate a range of incentive options so that producers are not inherently disincentivized from growing small grains.

RFI Question #8

Technical assistance

It would be helpful for producers and processors to have closer partnerships with USDA to achieve a better understanding of how climate-smart practices would impact their commodities. USDA research programs should be utilized to develop this information. For example, more information is needed on the climate-smart benefits of using fall-planted grain crops in rotation with other crops. In addition, currently there is not enough information on how climate-smart practices could affect the yield and quality of grain crops. As grain processors, we are concerned that certain practices, if adopted, may inadvertently negatively impact the production and functionality of the grain. More information and assistance is also needed for producers on the financial aspects, both the costs and benefits, of participating in climate-smart programs. Producers can make better decisions for their lands when there is a keen understanding of what outcomes they are likely to see from a change in practices.

Increased transparency

It would be helpful to both millers and producers to hear more from USDA about the agency's intentions for a climate-smart future for U.S. agriculture. Our industry would appreciate more interaction with USDA, such as listening sessions or discussions of

concepts that could then help us better understand and provide input into USDA's vision with regard to climate-smart policies.

Conclusion

We appreciate the opportunity to provide input as USDA strives to help mitigate climate change and lower U.S. emissions. We look forward to the continued partnership between the department and the agriculture and food sectors.

Sincerely,

A handwritten signature in black ink that reads "Jane B. DeMarchi". The signature is written in a cursive, flowing style.

Jane DeMarchi
President
North American Millers' Association