



December 21, 2022

Natural Resources Conservation Service
U.S. Department of Agriculture
1400 Independence Ave SW
Washington, D.C. 20250

Re: Docket No: NRCS-2022-0015

To whom it may concern:

The North American Millers' Association (NAMA) and National Barley Improvement Committee are (NBIC) are pleased to submit comments regarding the *Request for Public Input About Implementation of the Inflation Reduction Act Funding* (Federal Register Volume 87, Number 70770 (November 21, 2022) Pages 70770-70772).

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.

NBIC represents the U.S. barley community of growers, researchers, processors, users, and allied industries. The work of the NBIC seeks to secure both funding and favorable agricultural policies at the federal level.

As the link between producers and final products, our members will be part of any approach to mitigating climate change and enhancing a sustainable future for U.S. agriculture. We look forward to partnering with USDA on this endeavor.

(2) How can NRCS engage the private sector and private philanthropy to leverage the IRA investments, including for systems of quantification?

We are concerned that crops without access to substantial check-off dollars are falling farther and farther behind in the ability to participate in programs funded through the IRA and climate-smart commodities. Writing, managing, and even participating in grants is complicated and time consuming for small organizations with limited budgets and staff. We would like USDA research teams to be more actively engaged in research around beneficial practices and quantifying

benefits. As an example, crops like wheat, oats, rye, and barley are lacking crucial data about their beneficial impacts, which places them at a disadvantage.

In addition, through increasing technical assistance funding and improved data collection efforts, NRCS can engage more growers, processors, and additional parties.

(3) How should NRCS target IRA funding to maximize improvements to soil carbon, reductions in nitrogen losses, and the reduction, capture, avoidance, or sequestration of carbon dioxide, methane, or nitrous oxide emissions, associated with agricultural production?

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 and the financial health of their operations. USDA research programs should also be utilized to develop this information.

For example, Conservation Crop Rotation is an NRCS practice standard to address water and soil erosion and reduce pest pressure. However, additional quantification of these benefits would further encourage producers to utilize these and other practices. We strongly believe that conservation crop rotation should be a core pillar of USDA conservation programs. USDA could encourage crop rotation through additional payments or incentives for producers.

In addition, currently there is not enough information on how climate-smart practices could potentially 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 or will increase disease pressure.

More information and assistance is 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. Further, USDA should ensure that early adopters are not left behind when determining benefits for producers using climate-smart practices.

(4) How should NRCS streamline and improve program delivery to increase efficiencies and expand access to IRA funded programs and projects for producers, particularly underserved producers?

Technical assistance has been an on-going barrier to access NRCS programs. Additional investments in technical assistance and streamlining procedures will enable USDA to expand the pool of recipients.

National food security should not be lost in the drive to expand acres utilizing conservation and climate-smart practices. Program implementation should be geared to provide equal access to all crops and cropping systems and not unnecessarily tip the balance in favor of certain crops.

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. Creating standards will result in increased confidence in these climate-smart commodities, which in turn could increase participation in climate-smart practices, ultimately helping to reach the longer term goal of reducing carbon emissions.

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.

(5) How can NRCS expand capacity among partners to assist in providing outreach and technical assistance to support the implementation of IRA funding?

We are concerned that crops without access to substantial check-off dollars are falling farther and farther behind in the ability to participate in programs funded through the IRA and climate-smart commodities. Writing, managing, and even participating in grants is complicated and time consuming for small organizations with limited budgets and staff. USDA should provide pre-funding grants to fund the development of proposals and data for smaller organizations and crops.

In addition, USDA should sponsor listening sessions or discussions of concepts that could then help everyone 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,

Jane DeMarchi
President
North American Millers' Association

Ashley McFarland
Executive Secretary
National Barley Improvement Committee