

December 21, 2022

Mr. Terry Cosby
Chief
USDA Natural Resources Conservation Service
Washington, D.C.

Federal Register Docket ID: NRCS-2022-0015

Dear Chief Cosby:

Environmental Initiative serves as administrator for the Midwest Row Crop Collaborative, a partnership made up of industry leading supply chain companies and environmental nonprofits, spanning the full food and agriculture value chain. MRCC members include Bayer, Cargill, Environmental Defense Fund, Kellogg Company, The Nature Conservancy, Nestle, Nutrien Ag Solutions, Oatly, PepsiCo, Unilever, Walmart, and WWF.

As administrator, we welcome the opportunity to submit our comment to the NRCS Request for Public Input About Implementation of the Inflation Reduction Act Funding. Many of our members have submitted individual comments as well. This feedback is intended to support and reinforce members' materials and to provide perspective from across the value chain. The comments are most relevant on the question: 2) *How can NRCS engage the private sector and private philanthropy to leverage the IRA investments, including for systems of quantification?*

Public-private partnership programs are vital to successful conservation efforts because they bring in new farmers who wouldn't otherwise seek US Department of Agriculture resources, encourage collaborative innovation on locally specific projects where new ideas can be tested quickly, and spur sector innovation by supporting upfront costs of practice implementation.

To best engage the private sector and leverage IRA investments, we encourage the following:

- Administer the IRA funding for the Regional Conservation Partnership Program (RCPP) in a manner that makes the program as similar as possible to how the current Partnerships for Climate-Smart Commodities (PCSC) is being administered, allowing for innovation and partnerships.
- Using PCSC as a model, establish two funding pools for both RCPP and Conservation Innovation Grants (CIG): one for small and/or underserved

producers, and one for large producers, to ensure equity and access for all farmers.

- Establish or codify a regenerative value chain coordinator(s) at USDA, either in the Secretary of Agriculture's office or in Office of the Undersecretary of Farm Production and Conservation. This role would be well-positioned to gather private sector, NGO, and farmer input on best practices for regenerative agriculture, identify insights from monitoring, reporting, and verification developments, advise the Secretary on scaling regenerative agriculture programs, and expand the reach of existing programs.
- Leverage the opportunity of the IRA to create a dedicated program to support systematic identification of scalable innovations and integration of those approaches into broader USDA programs to improve outcomes for climate, biodiversity, protection of sensitive ecosystems, and water quality and quantity. NRCS should create an advisory group pulled from academia, the private sector and philanthropy to provide input on opportunities for further investment and engagement to scale and ensure success.

Additional recommendations, not specific to Question 2, include the following:

Technical Assistance & Infrastructure

- Increase technical assistance for producers and private partners to bolster evaluation and reporting requirements, including but not limited to increasing funding for NRCS staff using cooperative agreements with local partners.
- Provide growers with resources – such as technical assistance – to adopt regenerative agriculture practices. It is imperative that any technical assistance is aligned with and supportive of USDA funding programs. For instance, climate-smart grants and IRA monies should be working hand in glove, with coordination across the USDA to simultaneously mitigate duplicative funding and ensure the neediest applicants have access to funding.
- Expand eligibility to include projects that invest in rural infrastructure and economic development that supports climate-smart agriculture like processing and storage.



Program Administration & Data Integrity

- Allow program timelines that allow farmers to fully establish the practice (i.e. 3-5 years for cover crops).
- Review and realign sign-up dates for programs to better support farmers in transitioning to climate-smart agriculture. Many farmers in the Midwest plant cover crops in the fall, and programs that require enrollment nearly a year in advance create challenges for planning.
- Simplify enrollment for farmers using best practices from other types of programs (i.e., disaster relief) that allow for flexible and efficient deployment.
- Track and measure farming entities that have received funds from multiple USDA sources (i.e. IRA and PCSC) with the objective of increasing impact through production acres and number of farmers engaged.
- Provide oversight which maintains farmer data security and privacy rights, which will ensure maximum impact of these public funds.
- Invest in digital infrastructure within USDA, with focus on consistency across programs in data modelling.
- Support the improvement of robust measurement, monitoring, reporting and verification tools (e.g., COMET-Planner, Fieldprint Platform, Cool Farm Tool, DNDC model, and similar) to maximize credibility, compatibility, usability, and interoperability.
- Work with private sector partners to develop tools that improve the cost-effectiveness and accuracy of monitoring, measurement, reporting, and verification (e.g. geospatial or remote monitoring tools) to help farmers engage in ecosystem markets and verify practices and impacts for value chain partners.



Thank you for the opportunity to comment on this historic investment in climate-smart agriculture. We look forward to continued dialogue and discussion with USDA as we work together to make our landscapes more regenerative and resilient.

Sincerely,

A handwritten signature in black ink that reads "Ariel Kagan".

Ariel Kagan
Director, Agriculture Strategy
Environmental Initiative, administrator of the Midwest Row Crop Collaborative