



Executive Summary

To build a food and agricultural system that is truly resilient and able to combat the climate crisis, the USDA will need to advance soil health, ecological regeneration, equity, and justice.

Existing and future USDA programs should draw on the principles outlined in approaches like regenerative agriculture, agroecology, and organic agriculture to rebuild and maintain soil health, biodiversity, nutrient cycling, resilience to flooding and drought, groundwater recharge, and soil and water retention. Science and practice have shown that advancing these holistic approaches to farming will be the most effective way that the USDA can mitigate climate-change and build resilience.

To encourage farmers to adopt regenerative agriculture practice that can tackle the climate crisis, the following are some of our policy recommendations:

- Work with Congress to increase funding for Natural Resources Conservation Service Programs, improve their accessibility, and ensure funding focuses on practices based in principles of regenerative agriculture and similar approaches
- Transition crop insurance away from yield-focused risk mitigation to more holistic, resilient farm management
- Create a new dedicated program that is a comprehensive support system for farmers transitioning to organic and regenerative agriculture

To make USDA's work to address the climate crisis more just and equitable, the following are some of our policy recommendations:

- Address ongoing issues of discrimination experienced by BIPOC farmers at local USDA offices
- Fully implement 2018 Farm Bill provisions to address "heirs property" issues and stem Black owned land-loss
- Fully implement delayed landmark tribal provisions passed in 2018 Farm Bill
- Improve access to USDA programs by Socially Disadvantaged Farmers and Ranchers with Limited English Proficiency

We have several concerns and recommendations surrounding the carbon market and carbon credit proposals the USDA is considering for addressing the climate-crisis. Some of our concerns include that these proposals focus too narrowly on soil carbon

sequestration instead of a more holistic total impact approach, that they will be pursued as an alternative to strong regulation of polluting industries, and that they will likely benefit large-scale producers more than small-scale, people of color, and young and beginning farmers, and thus could further consolidate land and market control. We recommend that the USDA instead support more holistic financing schemes that pay farmers for broader ecosystem services while foregrounding justice and equity.

Read full response to the USDA's request for comment [here](#).