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COUNCIL

Recommendations for USDA Action in First 100 Days



**Submitted by the American Sustainable Business Council &
Regenerative Agriculture and Justice Working Group**



Recommendations for USDA Action in First 100 Days

We are a broad coalition of stakeholders that has collaborated through American Sustainable Business Council’s Regenerative Agriculture and Justice Working Group (see end of report for listing of participating organizations) to develop policy recommendations for the Biden-Harris Agency Review. Our group brings together business leaders from industries throughout the agricultural value chain, advocacy organizations, and groups representing farmers, workers, and frontline communities. We share collective priorities to advance a more resilient, regenerative, and just food and agricultural economy. These recommendations will help achieve those priorities through concrete policy and administrative action within the first 100 days (and beyond) of the next Administration.

This working group proposes these changes from the lens of increasing overall economic health and inclusivity, centered on increasing the well-being of all Americans. We believe these recommendations align holistically with the priorities outlined in the Biden-Harris Plan to Build Back America

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1. Maximize Department Support for regenerative agriculture tool with climate change mitigation and resilience as a priority
 2. Address ongoing effects of historical injustices
 3. Build resilience throughout the agricultural value chain
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To work with ASBC and the Regenerative Agriculture and Justice Working Group /to implement these recommendations, please contact us:

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Priority: Maximize department support for regenerative agriculture as a tool to build resilience, grow the economy, and combat climate change in an equitable and just manner

Climate change and ecological degradation is already affecting businesses, farmers, workers, and communities, and we know failure to act will spell disaster and hardship for all. On the other hand, expanding agricultural practices that help reverse these trends will also improve farmers' incomes and resilience to extreme weather events, create new value opportunities for businesses, create new jobs, strengthen supply chains for businesses and consumers, and provide more nutritious foods.

We recommend the White House and/or Secretary issue the following orders that will maximize department support for soil health, ecological regeneration, clean air and water, and created a more resilient system for the production of diverse and nutritious foods, quality fiber, and other agricultural materials.

Advance critical infrastructure for the scaled adoption of practices that improve soil health and climate resilience

See the following recommendations from Land Core to start building out the infrastructure to improve soil health across the country, and see [here](#) for the rest of their recommendations:

- Direct NRCS to establish a consistent set of soil health indicators, consistent in-field sampling methodology, lab calibration protocols and recommendations for the use of satellite observations, and other complementary, remote-sensing, real-time monitoring technologies.
- Direct NRCS to revitalize the [National Resources Inventory's Soil Monitoring Network](#), a national-scale network of sites sampled and analyzed periodically to track changes in soil properties (in conjunction with the [Web Soil Survey](#)) essential for building accurate models for agricultural and climate risk, and to serve as a baseline for regionally-appropriate soil health benchmarks

Expand the Aggie Bond Program to facilitate investment in regenerative and resilient food and agriculture

Aggie Bonds are an existing federal-state partnership that allows private lenders to receive federal and state tax-exempt interest on loans made to small and midsize beginning farmers. The program could greatly increase the amount of capital available to regenerative farms, but it's been marred by inefficient implementation with many states not supporting the program and others not developing a streamlined process. The USDA could work with the IRS to take the process that is working in the few states with functioning programs and implement it across the country. Fixing this would provide more financial inclusion and lower cost capital

for small and beginner farmers, incentivizing better caretaking of the land. For more information, please see this [memo](#).

Leverage Federal Procurement to create new markets and increase demand for regenerative agriculture products.

Issue an order requiring the use of food service guidelines for food and beverages sold and served at federally owned or operated facilities that meet or exceed the [Food Service Guidelines for Federal Facilities](#). These guidelines highlight purchasing of sustainable and regenerative agriculture products.

Enhance existing NRCS Conservation programs to optimize impacts on environment and facilitate more wide-spread and equitable access

For more details on the bellow recommendations and a through discussion of other recommendations the NRCS can take to improve design and implementation conservation programs, see [National Sustainable Agriculture Coalition's 2020 Priorities for Administrative Action](#).

- Improve transparency in EQIP application process to improve access for those that are not as well connected to local NRCS offices
- To maximize the number of farmers who can participate in EQIP and CSP, eliminate double-dip programs that permits joint operations and farms participating projects to receive twice the payment limit
- Publish and implement a plan to address the weaknesses in the enforcement of conservation compliance for highly erodible land and wetland, including inadequate state-level spot checks, the lack of participation by some states, and the failure to address gully erosion.
- Recognize when traditional indigenous conservation practices on tribal land are substantively equivalent to NRCS Conservation Practice Standards and thus are eligible for funding from federal programs. To facilitate this, adopt Indigenous Field Office Technical Guides (IFOTG) as an alternative to the standard national NRCS FOTG (see pg. 99 of this [publication](#) to learn more)

Priority: Address ongoing effects of USDA's discrimination and exclusions to advance more just economic development

Current agricultural policy and market structure favor large-scale industrial producers, which are mostly white males. Meanwhile, non-white male producers have faced discrimination in accessing government farming programs, and markets, and for the most part, still do not have

equal access. (See [this recent publication](#) for an exploration of how the ongoing effects of historical discrimination hinders the NRCS’s conservation efforts). Many of these farmers and their ancestors practiced regenerative agriculture for centuries before the term existed. Centering the voices of the marginalized and oppressed and including all stakeholders is important because so many movements in the past have fallen apart for failure to include key groups. Regenerative agriculture must work for everyone involved.

Implement 2018 Farm Bill provisions to address “heirs property” issues and stem Black owned land-loss

To stop Black families and farmers from losing their land, direct the USDA to fully implement new land tenure provisions in the 2018 Farm Bill aimed at protecting heir’s property owners, stemming black farmer land loss, and improving access to agricultural credit for rural communities of color. The USDA has so far failed to implement these provisions and must do so immediately in a fair and transparent manner, and in close collaboration with black farmer community-based organizations with the history and legitimacy to make these provisions effective on the ground.

For more information, please read this [backgrounder](#) and reach out to Jordan Treacle of National Family Farm Coalition, jordan@nffc.net, Cornelius Blanding of Federation of Southern Cooperatives, cornelius@federation.coop, or Lorrette Picciano, lpicciano@ruralco.org.

Fully implement delayed landmark tribal provisions passed in 2018 Farm Bill

The 2018 Farm Bill passed landmark provisions designed to provide tribal nations and their citizens opportunities to advance their food security efforts, agricultural production, operations, economic and workforce development initiatives, and public health priorities. For the latest updates on these provisions, check out the Indigenous Food and Agriculture Initiative’s 2018 Farm Bill Implementation Tracker [here](#). To make progress towards addressing centuries of injustice and exclusion perpetuated towards tribal nations, the USDA must move to finalize all pending rules without delay.

Strengthen implementation of Farm Bill’s major tribal provisions:

- After the USDA has taken the first legally required step of elevating the Office of Tribal Relations (OTR) to be fully within USDA’s Office of the Secretary, next the USDA must ensure the OTR is (1) fully staffed with experienced professionals with particular expertise working in and with Indian Country, and (2) integrated into the central functions of the Department as the primary Indian Country point of contact for all federal agriculture programs.

For more information on how the USDA can best advance equity, access, and justice for tribal producers and all Native Americans, please reach out to Wizipan Little Elk of Rosebud Sioux Economic Development Corporation, wizipan.littleelk@sicangucorp.onmicrosoft.com.

Enhance design and implementation of USDA programs for more equitable access, with an emphasis on access for historically discriminated against groups

To improve Access to USDA programs by Socially Disadvantaged Farmers and Ranchers with Limited English Proficiency (LEP), the National Latino Farmers and Trade Association makes the following recommendations:

- Listening sessions to determine existing barriers
- Increase awareness within USDA agencies
- Monitor outreach efforts to ensure farmers are aware of translation services
- Recruit bilingual employees to interpret information.
- Virtual communication with producers to assist with explaining and completing loan applications
- Work with local entities to create markets for products
- Increase knowledge of internet tools

For further information, please contact Juan Garcia at tnorias@gmail.com or Rudy Arredondo at latinofarmers@live.com.

- For more recommendations on how to ensure equitable access for USDA programs please see the [National Sustainable Agriculture Coalition's Recommendations](#) (pgs. 12-13, 19-20, 26-27, 36-37, 40-41).

Priority: Build resilience throughout the agricultural value chain

Achieving resilience in the food and agricultural systems means ensuring secure livelihoods for producers and workers and reducing supply-chain interruption that threaten food and materials access for businesses, consumers, and communities. For too long now, U.S. farmers have been carrying the brunt of risk and have been producing at a loss, with too many struggling to make a living.

Further, Covid-19 has exposed what many already knew. Government and market structures have facilitated increasing concentration of agribusiness and control of farming land. Relying on a handful of intermediary corporations to process and provide most of our food and fiber makes our farmers, businesses, and communities susceptible to market disruptions. Though [legislative action](#) and/or action from the Department of Justice will be necessary to address these issues, we have identified several areas where the USDA can help build economic resilience throughout the agricultural value chain.

Promote farmer rights and competitive markets in the livestock sector

- Fully implement the [2016 Farmer Fair Practices Rules](#) (also known as the GIPSA rules), which the Trump administration delayed and then withdrew in October 2017
- Update and republish the Western Organization of Resource Councils (WORC) [Rulemaking Petition](#) under the Packers and Stockyards Act to require open, public bidding for captive cattle supplies
- [Publish a final rule on the origin of livestock](#) ensuring a level playing field for thousands of U.S. organic dairy farmers.

Reduce fire risks through collaboration with federal, state, and local agencies

For farmers and ranchers from Texas to California, as well as the states' businesses and communities, wildfires have become a yearly struggle. We have promoted regenerative agriculture and soil health as a way of building resilience to extreme weather events like drought and hurricanes. While on-farm management can often play an [important role](#) in mitigating fire risks, improved USDA Forest Service coordination with the DOI and other agencies will be vital.

- Enter a memorandum of understanding (MOU) to improve forest management plans through interagency coordination and collaboration. An interagency team can evaluate resources, develop recommendations, and identify additional tools that can enhance carbon removal potential in forests. This team can work to reassess forest management plans at the national, state, tribal, and regional levels.
- Develop a federal version of [California's Fire MOU Partnership](#)

For more information on these recommendations, please see [Carbon 180's Priorities for Administrative Action](#) (pg. 24-25).

Who We Are and What We Do

American Sustainable Business Institute (501 C 3) & American The American Sustainable Business Council (501 C 4) is a coalition of business organizations and businesses advancing market solutions and public policies at the national, state and local level that support a vibrant, just and sustainable economy. ASBC and its members represent over 250,000 businesses and understand that sustainable business is good business, and a sustainable economy is a prosperous, resilient one ASBI informs and engages business leaders, while educating decision makers and the media about opportunities and public policies that can lead to an equitable and sustainable economy. www.asbcouncil.org

The following business and organizations contributed to these recommendations through collaboration in **ASBC's Regenerative Agriculture and Justice Working Group.**

Coalition Members

Iworker1vote	Landcore
American Farmland Trust	Maine Farmland Trust
Ben & Jerry's	National Family Farm Coalition
Biological Capital	National Latino Farmers and Ranchers
Capital Institute	Trade Association
Carbon 180	Naturepedic
Carbon Underground	Organic Trade Association
Clean Yield Asset Management	Other Half Processing
Climate Collaborative	Patagonia
Cooperative Food Empowerment Directive	Pipeline Foods
Coming Clean Coalition	Pure Strategies
Dirt Partners	Regenerative Organic Certified
Egg Innovation	Rosebud Sioux Economic Development
Farmworker Association of Florida	Corporation
Farmland Trust	Scenic Hudson
Federation of Southern Cooperatives	Something Better Food
Friends of the Earth	Steward
Forum for the Future	Textile Exchange
Green America	United Food and Commercial Workers
Hawthorne Valley Farm	International Union
HB Specialty Foods	Vermont Land Trust
JSA Wealth Management	Walk your Talk Productions
Kiss the Ground	Zero Food Waste

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