

Why the “Growing Climate Solutions Act” Will Fail Farmers, Harm Frontline Communities, and Exacerbate the Climate Crisis

S. 3894, the Growing Climate Solutions Act, would allow the USDA to certify agricultural carbon trading providers. This bill is touted as benefitting farmers and combatting greenhouse gas emissions. According to its proponents, S. 3894 would:

- Create a USDA certification program for third party carbon trading firms with standards for measurement, verification, monitoring, and reporting on carbon sequestration initiatives.
- Create a “one stop shop” to educate and enroll farmers.

However, this legislation will not effectively address the climate crisis or the farming crisis. It will not provide solutions for America’s struggling family farmers or ensure a healthy, sustainable, and resilient food system. More than a decade of carbon trading has shown clearly that carbon markets have been gamed to benefit polluters, failed to reduce emissions in line with science, and even led to increased emissions in many cases. They have exacerbated pollution hotspots in low-wealth communities and communities of color in the U.S. and throughout developing countries. Less than a decade remains to have any reasonable chance of keeping global temperature rise to no more than 1.5 degrees Celsius. Greenhouse gas (GHG) reductions must be absolute reductions without any possibility of offsets.

Carbon Markets Have Failed to Solve the Climate Crisis and Harmed Vulnerable Communities

Carbon markets are based on offsetting schemes. Under these schemes, some polluters are allowed to pollute as usual in exchange for purchasing so-called carbon “credits” from projects that are supposed to reduce an equivalent amount of carbon. While this sounds reasonable in theory, it does not work in practice:

- Carbon markets have proven to be ineffective in reducing GHG emissions.¹ For example, in 2016, the European Commission found that only 2% of the United Nations’ premier offsetting scheme, the Clean Development Mechanism (CDM), had a high likelihood of being effective.²
- Carbon markets have been plagued by fraud, creative accounting, and a lack of environmental integrity.³
- Carbon prices have remained far too low to be effective.⁴
- Carbon markets have exacerbated pollution hotspots in low-wealth communities and communities of color in the U.S. and throughout developing countries.⁵
- Inadequate safeguards have led to human rights abuses, violations of the rights of Indigenous Peoples and forest dwellers, land rights conflicts, and environmental devastation.⁶

Carbon Markets Won’t Solve the Farm Crisis

- Carbon markets will enrich the few. Carbon markets in other sectors have predominantly benefited large actors and left behind small to medium-scale actors.
- Introducing new markets that predominantly benefit the largest producers will lead to further consolidation of wealth and power in our food system.
- Carbon markets would allow factory animal farms (CAFOs) and other industrialized producers to continue to pollute in frontline communities by “trading” emissions.
- The bill’s corporate backers — including Syngenta, Cargill, and ADM — could use carbon credits to continue polluting or to sell to other polluters, thereby greenwashing their operations.
- There is a concern that farmers participating in these programs will be required to use patented microbial seed coating and digital technology to remotely track soil carbon, emissions, and land management decisions. With no national farmer data protection

measures, farmers are vulnerable to data mining by seed and chemical companies and carbon traders.

- Relying on private companies to measure carbon sequestration on farms without significant protections represents a serious data security risk for farmers and our food system.
- Soil carbon is just one indicator of the health of agricultural ecosystems and is a difficult one to accurately measure compared to others. Carbon numbers are subject to constant debate whereas biodiversity, ample water, cooling of the biosphere, and high productivity are readily apparent. Focusing only on carbon could incentivize unsustainable, chemical-intensive industrial agriculture practices.

A Better Way Forward: Supporting Farmers in Adopting Ecologically Regenerative Agriculture

Ecologically regenerative farming should be incentivized *in addition to*, and not *instead of*, carbon reductions in the energy sector. We need policies that help farmers adopt ecologically regenerative practices, which enhance soil health, protect biodiversity, and help make our food system more resilient to the climate crisis. Family farmers should be supported in these efforts with structural reforms that ensure fair markets and fair prices.

- Carbon sequestration is only *one* of many benefits of regenerative farming. Practices like cover cropping, crop diversification, composting, no- or reduced-till farming, and managed grazing of livestock can also save precious water resources, improve soil health, and bolster farmers' resilience to drought, flooding, and climate chaos.⁷
- Regenerative practices and organic farming already represent significant opportunities for many, but producers require assistance in transitioning and a level playing field; market-based solutions will not provide sufficient support.
- Much larger structural and economic shifts will be required to support historically disadvantaged and underserved farmers.

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¹ <https://www.theguardian.com/environment/2015/aug/24/kyoto-protocols-carbon-credit-scheme-increased-emissions-by-600m-tonnes>

² Martin Cames et. Al, [How additional is the Clean Development Mechanism?](#), March 2016

³ <https://greenfinanceobservatory.org/wp-content/uploads/2019/03/50-shades-carbon-final.pdf>

⁴ <https://law.stanford.edu/publications/why-carbon-pricing-isnt-working/>

⁵ <https://carbonmarketwatch.org/publications/the-clean-development-mechanism-local-impacts-of-a-globalsystem/>; Bachram H

⁶ <https://www.ienearth.org/carbon-offsets-cause-conflict-and-colonialism/>

⁷ Kendra Klein, [Why Talk of Regenerative Agriculture Should Include Pesticide Reduction](#), Food Tank, 2019.