

**October 15, 2020**

Dear Members of Congress:

We, the undersigned organizations, encourage you to oppose the Growing Climate Solutions Act of 2020 (S. 3894/H.R. 7393). While agriculture and land management can play key roles in addressing the warming climate, this legislation will allow greenhouse gas emissions to continue unchecked and will undermine efforts to build a healthy, sustainable, and resilient food system.

The Growing Climate Solutions Act will require the U.S. Department of Agriculture to help agricultural entities generate carbon credits by certifying third-party verifiers and creating a “one stop shop” to educate and enroll farmers in third-party carbon markets. Power plants, refineries, and other polluters can purchase these carbon credits to offset their emissions instead of actually reducing and eliminating them.

This legislation aims to build a framework for broad-scale development of carbon markets and pave the way for a national cap and trade program. We oppose these carbon schemes for the reasons discussed below. Further, while cap and trade programs create significant challenges for accountability, the program established under S. 3894 would set the stage for unprecedented corruption by not establishing any benchmarks or policies on how farmers can reduce emissions, nor a clear plan for making information public.

#### Carbon Markets Fail to Solve the Climate Crisis and Harm Vulnerable Communities

Carbon market offset schemes such as those promoted by the Growing Climate Solutions Act allow polluters to continue business as usual in exchange for purchasing carbon credits from projects that are supposed to reduce an equivalent amount of carbon. This does not work in practice.

More than a decade of carbon trading has shown that carbon markets have been gamed to benefit polluters, failed to reduce emissions, and even led to increased emissions in many cases. In 2016, the European Commission found that only 2% of projects in the United Nations’ premier offsetting scheme, the Clean Development Mechanism (CDM), had a high likelihood of ensuring emissions reductions. In 2010, the Chicago Climate Exchange, a voluntary offset program in the United States, collapsed as a result of too many credits and not enough buyers, leaving farmers and ranchers without support for their efforts.

Soil carbon is especially unsuited for commodification and trading. Soil carbon storage is impermanent; carbon sequestered in the soil can be released with a change in land management practices or through severe weather events. In addition, the tools to measure soil carbon to the degree of accuracy needed do not currently exist. Without adequate measurement tools or guarantees of permanence, quantifying soil carbon to use in a carbon market becomes a guessing game and does not guarantee actual reductions in greenhouse gas emissions.

Carbon markets have exacerbated pollution hot-spots in low-wealth communities and communities of color. Existing carbon offset markets allow power plants and industrial polluters to purchase credits that permit them to continue burning fossil fuels, including gas from fracking, extending a lifeline to an industry that is polluting our air, water, and climate. Worldwide, carbon

markets have led to human rights abuses, violations of the rights of Indigenous Peoples and forest dwellers, land rights conflicts, and environmental devastation. While we must facilitate the creation of a healthy, just, and regenerative food system, we cannot support further pollution in frontline communities and the exacerbation of racial health disparities.

### Carbon Markets Won't Solve the Farm Crisis

While small-to-medium-scale, diversified, and socially disadvantaged farmers need assistance and reforms to stay in business and feed communities, carbon markets disproportionately benefit the largest producers, who have the economies of scale to generate enough carbon credits to potentially turn a profit.

Factory farms are cashing in on pollution trading schemes by installing anaerobic digesters that capture methane emissions from animal waste and turn it into biogas. In California, digester construction is funded with public money generated by cap-and-trade. Smaller farmers do not generate enough manure to make digesters profitable, even with the subsidies provided through the carbon market. This model entrenches the unsustainable factory farm system, which harms rural communities and animal welfare, exacerbates the climate crisis, and encourages production of massive amounts of animal waste necessary to supply digesters.

The Growing Climate Solutions Act'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 are also concerns that farmers participating in voluntary offset markets will be required to use certain practices and products, including patented microbial seed coatings, seeds and pesticides, along with 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.

Proponents of the bill position voluntary carbon markets as a way for family farmers to derive new value from their land. However, more structural reforms around fair pricing, supply management, and increased support for existing conservation programs would help small-to-mid-sized producers and historically underserved farmers. On the other hand, carbon markets would incentivize, rather than combat, agricultural consolidation and do nothing to protect farmers and farmworkers. Carbon markets would reduce the possibilities of price parity that would pay better wages to farmers as well as the opportunities for landless young farmers to access land. Carbon markets, voluntary or not, are yet another false promise to family farmers.

### A Better Way Forward

Instead of continuing the legacy of pollution through carbon markets, we encourage policies that eliminate pollution at the source and support local food economies, better living wages for farmers and farmworkers, and pathways for sustainable practices of food and energy production.

Congress needs to pass a ban on factory farming, increase funding for existing conservation programs, and support farms in adopting regenerative practices that enhance soil health, protect biodiversity, and help make our food system more resilient to the climate crisis. Family farmers need structural reforms that ensure fair markets and prices, and infrastructure supporting transitions to and sustainable continuance of regenerative farming.

Ecologically regenerative farming should be incentivized in addition to, and not instead of, carbon reductions in the energy sector. We urge you to oppose the Growing Climate Solutions Act of 2020.

Sincerely,

1748 Bakehouse  
350 Humboldt  
350 Silicon Valley  
350 Triangle  
350.org  
350nyc  
50by40  
ACLE  
ActionAid USA  
Advocates for a Clean Lake Erie  
Allamakee County Protectors  
Alliance for a Green Economy  
Amazon Watch  
Animals Are Sentient Beings, Inc.  
Assateague Coastal Trust  
Association for Farmers Rights Defense, AFRD  
Georgia  
Bay Area-System Change not Climate Change  
(BA-SCnCC)  
Bayview Hunters Point Mothers and Fathers  
Committee  
Berks Gas Truth  
Beth Gelfond Marketing Consultant  
Beyond Pesticides  
Biodiversity For A Livable Climate  
Biofuelwatch  
Bronx Climate Justice North  
Broome Tioga Green Party  
Buckeye Environmental Network  
California Communities Against Toxics  
California Environmental Justice Alliance  
Californians for Pesticide Reform  
Call to Action Colorado  
Catholic Network US  
CCAG  
Center for Biological Diversity  
Center for Environmental Health  
Center for Environmental Transformation  
Center for Food Safety

Chiron Communications  
Church Women United in New York State  
CleanAirNow  
Climate Action Now Western Mass.  
Climate Hawks Vote  
Climate Justice Alliance  
Cloonybreen Farm, LLC  
Coalition Against the Pilgrim Pipeline - NJ  
Colorado Farm and Food Alliance  
Community Action Works Campaigns  
Community Alliance for Global Justice  
Concerned Citizens Against Industrial CAFOs  
Concerned Residents of Oxford  
Cultivate America  
Democratic Women of the Prescott Area  
divinAmerica  
Dogwood Alliance  
DOMINICAN Sister in Committed Collaboration  
Don't Gas the Meadowlands Coalition  
Down East Coal Ash Environmental and Social  
Justice Coalition  
Dr. Bronner's  
Dryden Resource Awareness Coalition  
Earth Action, Inc.  
EcoEquity  
Ecosocialist Working Group Democratic  
Socialists of America - San Francisco chapter  
EEECHO  
Elders Climate Action  
Endangered Species Coalition  
Environmental Education Fund  
Environmental Justice Coalition for Water  
Environmental Justice Taskforce of the WNY  
Peace Center  
EXCELLIM CORPORATION  
Experimental Farm Network  
Factory Farming Awareness Coalition  
Fair World Project  
Family Farm Defenders

Farmworkers Association of Florida  
Fibershed  
Florida EcoSattva Group  
Florida Immigrant Coalition  
Food & Water Action  
Food Democracy Now!  
Food for Maine's Future  
Food in Neighborhoods Community Coalition  
Franciscan Action Network  
Franciscan Sisters of the Atonement  
Friends of the Earth  
GAIA  
Grassroots Environmental Education  
Green Education and Legal Fund  
Green Party of Brooklyn  
Green Party of Nassau County  
Greenaction for Health and Environmental Justice  
Greenbelt Climate Action Network  
Groundswell International  
HANI HONEY COMPANY  
Harford County Climate Action  
Hawai'i SEED  
Hawai'i Alliance for Progressive Action (HAPA)  
Henry County Farmers and Neighbors  
Hoosier Environmental Council  
iEat Green  
Indigenous Environmental Network  
Inland FoodWise Online  
Institute for Agriculture and Trade Policy  
Institute for Policy Studies Climate Policy Program  
Investment, Community, Visibility (ICV)  
Iowa CCI  
Iroquois Valley Farmland REIT, Public Benefit Corporation  
Irthlingz Arts-Based Environmental Education  
Just Transition Alliance  
Kansas Rural Center  
Kewaunee CARES  
Maryknoll Sisters Eastern Region USA  
Maryland Pesticide Education Network  
Mid-Missouri Peaceworks  
Middlebury Natural Foods Co-op

Morningside gardens Green Committee for Environmental Sustainability  
Mother's Out Front Chemung County NY  
Mountain Valley Climate Action 350VT  
Movement Rights  
National Family Farm Coalition  
NC Climate Justice Collective  
NC WARN  
New Growth Management  
New Jersey Tenants Organization  
New York Climate Action Group  
New York Communities for Change (NYCC)  
NJ State Industrial Union Council  
North American Climate, Conservation and Environment (NACCE)  
North Bronx Racial Justice  
North Country NYPAN  
North Shore Audubon society  
Northeast Organic Farming Association -- New York (NOFA-NY)  
Northeast Organic Farming Association of New Hampshire (NOFA-NH)  
Northeast Organic Farming Association-Vermont  
Northeast Organic Farming Association, Mass. Chapter (NOFA/Mass)  
Northern Plains Resource Council  
Northwest Center for Alternatives to Pesticides  
Nuclear Information and Resource Service  
NYCD16 Indivisible  
NYPAN Enviro  
NYPAN Greene  
Occupy Bergen County (N.J.)  
Occupy SF Environmental Justice Working Group  
Ocean Conservation Research  
Ohio Ecological Food and Farm Association  
Oil Change International  
Organic & Regenerative Investment Co-operative  
Organic Advocacy  
Organic Consumers Association  
Organización Boricúa de Agricultura Ecológica de Puerto Rico

Partnership for Policy Integrity  
People for a Healthy Environment  
Pesticide Action Network  
Plymouth Friends for Clean Water  
Poweshiek CARES  
Prescott Indivisible  
Presentation of Aberdeen  
Progressive Democrats of America  
Progressive Women of Pelham  
Public Justice  
Putnam Progressives  
RDC Social Justice Board  
Reach Out America  
Religious of Jesus and Mary  
RILES  
River Guardian Foundation  
ROAR (Religious Organizations Along The River)  
Rootskeeper  
Rural Coalition  
Seven Circles Foundation  
Sewing for Change  
Shelterra Group LLC  
Show Up LI  
Sisters of Charity Federation  
Sisters of Charity of New York  
Sisters of St. Dominic of Blauvelt, New York  
Slow Food Albuquerque  
Slow Food at Case Western Reserve University  
Slow Food Charleston  
Slow Food Cleveland  
Slow Food Denver  
Slow food East End  
SLOW FOOD GLADES TO COAST  
Slow Food Heartland  
Slow Food North Shore  
Slow Food Prescott  
Slow Food Sonoma County North  
Slow Food South Bay  
Slow Food Southwest Washington  
Slow Food Syracuse University  
Slow Food University of Utah  
Slow Food USA  
Slow Food Vegas  
Slow Food Western Slope

Slow Food Youth Network Chicago  
Slow Food Russian River  
Socially Responsible Agricultural Project  
Soil Carbon Coalition  
South Asian Fund For Education, Scholarship  
and Training (SAFEST)  
Sunflower Alliance  
Sunrise Movement  
Sunrise Movement New York City  
Sustainable Food Center  
Sustainable Putnam  
Sustainable Warwick (NY)  
The Corner House  
The Cornucopia Institute  
The Indigo Road Hospitality Group  
Thomas Berry Forum for Ecological Dialogue at  
Iona College  
Toxic Free NC  
Toxics Information Project (TIP)  
Trade Justice New York Metro  
Tri Valley CAREs  
Two Roads Homestead  
Upper Valley Affinity Group (Vermont)  
UU Congregation of Binghamton, Green  
Sanctuary  
Vermont Law School  
Voters For Animal Rights  
West Berkeley Alliance for Clean Air and Safe  
Jobs  
Winnovations International  
Zero Hour