December 21, 2022

Terry Cosby
Chief
Natural Resources Conservation Service
1400 Independence Avenue, SW
Washington, DC 20250

RE: Docket ID: NRCS-2022-0015: NRCS Request for Information

Dear Chief Cosby:

The Biological Products Industry Alliance (BPIA) appreciates the opportunity to provide comments on the NRCS Request for Information on the implementation of the Inflation Reduction Act funding. (Docket Number: NRCS-2022-0015: NRCS Request for Information).

BPIA promotes the responsible development of safe and effective biological products including biopesticides, biostimulants and biofertilizers. These beneficial tools are used in a variety of settings, including commercial agriculture, forestry, golf courses, home gardens, horticulture, and ornamentals. BPIA supports public health through education, outreach, and advocacy activities at the state, federal and international levels. BPIA's membership includes large, medium, and small producers of biological pest control products used extensively by farmers in the United States. Our members' products can also increase the uptake and utilization of existing and applied nutrients, providing new opportunities to reduce runoff and emissions, enhance carbon sequestration, conserve and replenish soil health, improve water quality, and preserve natural resources. Each of these benefits is squarely aligned with this Administration's focus on addressing climate change, conservation, and sustainability.

BPIA's comments appear below in *Italics*:

(1) What systems of quantification should NRCS use to measure the carbon sequestration and carbon dioxide, methane, and nitrous oxide emissions outcomes associated with activities funded through IRA?

- **How should NRCS design a scientifically-based framework for field-based quantification and analysis that can integrate into USDA's Greenhouse Gas Inventory and Assessment Program?**
- **What methods should NRCS use to quantify carbon sequestration and carbon dioxide, methane, and nitrous oxide emissions?**

USDA must expand and adapt the COMET-Farm tool so that it works for the specialty crop industry by investing in soil science research and updates to the NRCS SSURGO database, which provides site-specific climate data and results that include major specialty crop industries from each state.

Provide funding for the COMET-Farm tool to improve systems integration with existing data sources and models and to improve the overall diversity of crops. Benchmarks for inclusion of at least 100 crops into the COMET tool within 5 years should be put in place. Benchmarked crops should include major specialty crop industries from each state.

- **What sources of information should NRCS consider in developing protocols or what preexisting, standardized protocols should be used to support field-based data collection and analysis?**
- **What types of field-based data should be collected and analyzed to assess carbon sequestration and reduction in carbon dioxide, methane, and nitrous oxide emissions outcomes associated with agricultural and conservation activities?**
- **How should USDA monitor and track carbon sequestration and greenhouse gas emissions trends and the effects of NRCS supported activities?**
- **How or should the framework developed by NRCS to provide field-based quantification integrate with satellite data to provide a comprehensive picture of GHG emissions and removals from agricultural activities and conservation practice implementation?**

(2) How can NRCS engage the private sector and private philanthropy to leverage the IRA investments, including for systems of quantification?

NRCS must engage with the biological products industry, the IPM Institute of North America and others to develop a method of quantification for the greenhouse gas reduction benefits from the use of different types of crop protection tool. The WIN-PST tool that NRCS currently uses to assess pesticide risk does not include a method of quantifying potential for greenhouse gas reduction benefits. Nor does the WIN-PST tool include the contributions that the use of biostimulants, one of the fastest growing agricultural input sectors on a global scale, can play in greenhouse gas reduction benefits.

Similarly, NRCS should engage with academia, industry and NGOs, including agricultural producers and the broader ag value web, the biological products industry, IPM practitioners, ESG investors, environmental credit trading platforms, crop insurers and conservation and environmental NGOs, to valuate and incorporate other critical ecosystem services provided by agriculture, such as biodiversity, water quality and conservation, pollinator health and soil health, into public and private sector incentive programs.

(3) How should NRCS target IRA funding to maximize improvements to soil carbon, reductions in nitrogen losses, and the reduction, capture, avoidance, or sequestration of carbon dioxide, methane, or nitrous oxide emissions, associated with agricultural production?

NRCS should ensure it is looking comprehensively at all practices that can reduce greenhouse emissions, and specifically at opportunities within Pest Management Conservation Systems (595). There are many crop protection products that have a lower greenhouse gas footprint in the production process and have reduced emissions or formulations that result in fewer emissions when used in the field. NRCS must pursue additional methods of calculating the emission reductions from these different crop protection products.

Federal climate change policies should consider mitigation, resilience, and adaptation. The security and independence of this country relies on our nation's ability to continue to produce food and maintain the economic viability of US farming in the face of climate change. NRCS practices should reflect approaches to help farmers address mitigation, resilience, and adaptation.

(4) How should NRCS streamline and improve program delivery to increase efficiencies and expand access to IRA funded programs and projects for producers, particularly underserved producers?

NRCS should allow for all enrollment types for the conservation programs – cost share practices and incentive payments though EQIP and enhancements and bundles through CSP. NRCS must also ensure that they have practices that are appropriate to all regions and all cropping systems, especially specialty crop producers.

(5) How can NRCS expand capacity among partners to assist in providing outreach and technical assistance to support the implementation of IRA funding?

The impacts of climate change will be seen in the geographic shift in production and new pests and NRCS should be proactively working with partners and within USDA to understand the impact of these changes. NRCS should work with the specialty crop industry because climate change will result in opportunities for specialty crops to be produced in new growing regions. This will create expanded needs for employment, research, and the development of management practices in these areas to control for new or invasive pests and disease.

Climate change will impact specialty crop production, including migration of pests into growing areas. This will require agencies to be nimble and responsive to the needs of the industry in ensuring management tools are available.

Thank you for the opportunity to share these comments. Should you have any questions, please feel free to contact me.

Sincerely,

BIOLOGICAL PRODUCTS INDUSTRY ALLIANCE

Keith J. Jones
Executive Director