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,

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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 Boricuá 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