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The Food and Agriculture Climate Alliance (FACA) welcomes the opportunity to comment on USDA's Climate-Smart Agriculture and Forestry (CSAF) Partnership Initiative. FACA consists of more than 80 organizations representing farmers, ranchers, forest owners, agribusinesses, manufacturers, the food and innovation sector, state governments, sportsmen and sportswomen, and environmental advocates. Our organizations have come together to develop and advance shared climate priorities.

FACA supports innovative and voluntary solutions to reduce greenhouse gas emissions, increase carbon sequestration and storage, build resilience to the changing climate, and drive sustainability across the supply chain. We are pleased to see USDA embracing an incentive-based approach to advance the voluntary deployment of climate-smart practices on working lands. The newly announced CSAF Partnership Initiative can, if implemented carefully and thoughtfully, unlock new markets and increase demand for commodities produced using CSAF practices while building confidence in their climate benefits.

Our organizations believe voluntary carbon markets should be available and accessible to all producers and landowners despite regional differences, crop and production types, total acreage under crop production, farm and forest size, race or gender. In April, FACA submitted to USDA [recommendations](#) around a new pilot program to scale CSAF practices, remove barriers to adoption, develop consistent and credible criteria for carbon accounting, and ensure equitable opportunities for participation. When developing the CSAF Partnership Initiative, USDA should include key requirements to ensure the pilots will reach a wide range of producers and landowners, recognize crop diversity, and go far in reducing barriers to future participation in voluntary markets.

Specifically, FACA recommends USDA avoid burdensome application and eligibility requirements in order to expand program delivery to producers who may not have the technical capability to apply. Additionally, the pilot project applications should include a plan for engaging and enrolling Black, Indigenous, People of Color (BIPOC) and small farmers, ranchers, and forest owners in the project as well as resources dedicated to support their participation.



FACA also encourages USDA to develop meaningful opportunities for early adopters of CSAF practices to recognize their contributions and support the advancement of their work. FACA has endorsed a one-time payment to early adopters, contingent upon participation in a new, USDA-approved incentive program (such as the CSAF Partnership Initiative) or an existing conservation program.

FACA supports USDA's efforts to establish a CSAF Partnership Initiative and believes it is a critical step in increasing CSAF practices among all producers who choose to implement them. We stand ready to work with USDA as this Initiative is enacted.