



National Organic Coalition

October 27, 2009

The Honorable Debbie Stabenow
U.S. Senate
Washington D.C. 20510

Dear Senator Stabenow:

I am writing on behalf of the National Organic Coalition to offer comments on your draft legislation regarding allowable agriculture and forestry offset credits for climate change legislation (draft END09E67).

We appreciate your efforts to work with the agriculture community to ensure that climate change legislation not only meets its intended greenhouse gas reduction goals, but is also practical from the farmer standpoint. In that regard, we believe that organic agriculture has much to offer in terms of both carbon sequestration and greenhouse gas avoidance.

We thank you for your inclusion of “winter cover cropping, continuous cropping, and other means to increase biomass returned to soil in lieu of planting followed by fallowing,” as an eligible project for offset credits. We believe this to be an important practice from a climate perspective, particularly with the use of leguminous crops, which can reduce synthetic fertilizer use and sequester carbon.

However, in order to fully address the climate benefits of organic agriculture, we recommend the following additions and changes to your draft:

1) On page 18, lines 5 and 6, your draft refers to “(v) reduction in carbon emissions from organic soils and farming practices.” We recommend that this language be modified to read “reduction in carbon emissions from organically managed soils and farming practices used on certified organic farms.”

This is important because the term “organic soils” could be construed to mean soil rich in organic matter, as opposed to soils resulting from certified organic farming practices. The suggested modification would make this subsection more clear.

2) On page 18, lines 7-10 refers to “(vi) reduction in greenhouse gas emissions due to changes in animal management practices, including dietary modifications;”. We recommend that the phrase, “and pasture-based livestock systems;” be added at the end of

this subsection, to reflect the research demonstrating the climate benefits of pasture-based livestock systems.

3) On page 17, starting on line 19, section (b)(2)(K)(iii) is added to specify “the use of technology or practices to improve the management of nitrogen fertilizers,...”. This section makes sense, given the large amounts of energy required to produce synthetic fertilizers. Given this fact, however, we recommend that language be added that rewards practices that actually eliminate the use of synthetic fertilizers, either as a new section, or imbedded within the existing fertilizer section.

4) Within section (b)(2)(K), we recommend adding a new subsection to specify practices that “reduce or eliminate the use of pesticides,” as an “eligible project,” in recognition of the fact that a great deal of carbon emission results from the production, transportation and application of these chemicals. In addition avoiding pesticides can help maintain the vitality and carbon-sequestration capacity of soil.

5) Within section (b)(2)(K), we recommend adding a new subsection to specify “resource conserving, 3-7 year, crop rotations,” as an “eligible project,” in recognition that in addition to improving soil, rotations enable dramatic reductions in pesticide and industrial fertilizer use.

The science supporting each of these recommendations is detailed in a letter from the National Organic Coalition to the leadership for the Committee on Environment and Public Works Committee and Committee on Agriculture, Nutrition and Forestry, dated July 13, 2009. A copy of that letter was shared with your office on the same date.

Thank you for your consideration of these suggestions.

Sincerely,



Steven Etko
Legislative Coordinator