House Committee on Agriculture
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Senate Committee on Agriculture, Nutrition, and Forestry
Chairwoman Debbie Stabenow
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Dear Chairwoman Stabenow, Chairman Scott, and the respective members of the House Committee on Agriculture and the Senate Committee on Agriculture, Nutrition, and Forestry:

The 50 organizations listed below represent fenceline and Environmental Justice communities, food system workers and farmworkers, family farmers, businesses, scientists, and advocates for health, safety, conservation. We are together united in our fight for a just, equitable, and sustainable agricultural system. We submit these comments, which are guided by the vision of a safe and sustainable chemical industry outlined by the Louisville Charter for Safer Chemicals,[1] to support the passage of a Farm Bill that protects both people and the planet.

The Farm Bill presents a singular opportunity to reduce our nation's carbon footprint, stop the poisoning of farmworkers and Environmental Justice communities, and create a resilient farm system that serves the needs of family farmers and all communities for food, livelihoods and myriad ecosystem services.[2]

Through the Inflation Reduction Act (IRA), this Congress made a historic investment of nearly $40 billion for agriculture, forestry, and rural development, rightly acknowledging that we cannot address the existential threat of climate change without change to our agricultural system. We additionally applaud the IRA's allotment of billions of dollars of funding for Environmental Justice communities and concerns, which reinforces the work of the Biden Administration to build upon Executive Order 12898, *Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations*, through its Justice40 and other initiatives. Together, these efforts begin to address and repair the harm that petrochemical-reliant and energy-intensive industries have done for generations in communities who are all too often predominantly Black, Indigenous, communities of color, and low-income.

[1] *The Louisville Charter for Safer Chemicals*. http://www.louisvillecharter.org/
[2] "Ecosystem services" have been defined by the California Department of Food and Agriculture's Office of Environmental Farming & Innovation at https://www.cdfa.ca.gov/oefi/ecosystemservices/ and include the production of food, fiber and fuel; wildlife habitat & conservation of biodiversity; pollinators and natural pest controls; nutrient cycling; building and maintaining healthy soils; protection of water resources & water quality.

However, we cannot meaningfully respond to the climate crisis nor repair the harms of environmental injustice unless we enact deep, systemic changes to our industrial, chemical-dependent, extractive and exploitative agricultural system and the misdirected government policies that prop it up.

We call on Congress and the members of these respective committees to continue this work in the Farm Bill by enacting deep reforms to our nation's food and agriculture policies.

In order to build a just agricultural system that is not dependent on toxic chemical inputs, we must reform policies so they no longer encourage corporate control and consolidation in our food system and instead support diverse farmers and ranchers committed to more sustainable and regenerative systems. Importantly, achieving this mission requires not just allocating resources and support for the just and sustainable alternatives we wish to see make up our food system; it also requires undoing the current policies that have allowed our food system to be taken over by highly polluting and chemical-intensive, corporately-controlled, industrial-scale operations.

Unfortunately this vision is far from our current reality in which toxic chemicals abound, inflict harm throughout their life cycles disproportionately upon communities of color and that are low-income, and especially endanger farmworkers. A 2017 report from the United States Department of the Interior stated that about 1 billion pounds of pesticides are used on United States farms each year.[3] These along with other chemical-based agricultural inputs including fertilizers, pharmaceuticals, and plastics are built from fossil fuel inputs, which are in turn extracted from fenceline communities. These feedstocks are refined and manufactured into chemicals through a process that consumes significant energy (typically derived from fossil fuels) and releases toxic pollutants into communities where people live, work, worship, and go to school. The community health harms of multiple chemical exposures is well documented.[4] A study published earlier this year revealed that for populations within 1 mile of the pesticide production facilities in the U.S with the most environmental violations, 44% of residents have “incomes less than two times the federal poverty level, compared to the national average of 28%.”[5] Moreover in a review of pesticide metabolites across populations, it was found that “Non-Hispanic Blacks or Mexican Americans had higher average concentrations than non-Hispanic whites for 12 of the 14 pesticides/metabolites analyzed.”[6] Transportation and storage of agrochemicals puts lives at risk, as we saw so plainly at the 2013 ammonium nitrate explosion in West, Texas, and the near catastrophe at

[3] Baker, Nancy and Megan Shoda (2017, March 23). *Pesticides*. USGS Ohio-Kentucky-Indiana Water Service Center. https://www.usgs.gov/centers/ohio-kentucky-indiana-water-science-center/science/pesticides
[4] White, Ronald with Denise Moore, Michele Roberts, and Steven Taylor (2018, September). *Life at the Fenceline: Understanding Cumulative Health Hazards in Environmental Justice Communities.* https://ej4all.org/assets/media/documents/Life%20at%20the%20Fenceline%20-%20English%20-%20Public.pdf
[5] Donley, N., Bullard, R.D., Economos, J. et al. Pesticides and Environmental Injustice in the USA: Root Causes, Current Regulatory Reinforcement and a Path Forward. *BMC Public Health* 22, 708 (2022). https://doi.org/10.1186/s12889-022-13057-4
[6] ibid.

the Winston Weaver Fertilizer Plant in January of this year.[7] Finally, these toxic chemicals present daily threats to our nation's 2.4 million farmworkers – who bear the health impacts of multiple chemical exposures that permeate skin and clothing – and their families and children who are exposed to the residues that are inadvertently carried home.[8] These chemicals persist in the environment, degrading soil health, poisoning waterways, causing climate and air pollution, and finding their way into our bodies and in the food we eat.

In addition to this agrochemical pipeline that is toxic from cradle to grave, a 2021 study estimates that agriculture contributes 34% of the greenhouse gas emissions responsible for climate change[9] – a share significantly larger than the US Environmental Protection Agency estimates is caused by "Industry," "Transportation," or "Energy and heat production."[10] In short, there is no path to averting climate catastrophe or securing environmental justice without eliminating the outsized chemical and climate footprint of the agriculture industry. The same policies permitting corporate control and abuse of our food system also create its outsized chemical and climate footprint and endanger rural economies. On the other hand, we can protect communities from chemical, climate, and other harmful pollution by shifting policies to support smaller independent farmers engaged in sustainable, regenerative agriculture and building up diversified, local food systems. This will create a more resilient and healthy food system that benefits us all.

Finally, we must recognize that, in addition to these direct human health impacts, overuse of toxic chemicals degrades soil health and makes our agricultural system less productive and less resilient to the impacts of climate change. Indeed, heavy reliance on chemical inputs arises from corporate consolidation, wherein agro-chemical companies exert inordinate market influence to keep our system hooked on their products and on unsustainable, soil-health destroying practices such as monocropping. Thus, as Congress considers how to protect our food system from climate impacts and reduce its contribution to climate change, it must simultaneously address corporate control and the use of toxic chemicals.

As we prepare for the 118th Congress and the negotiation of the 2023 Farm Bill, U.S. agricultural policy must create an agricultural system that values human life today and for generations to come. To do that, we will need to shift investments away from ineffective, misguided, and unproven solutions – peddled by industry lobbyists under the guise of being "climate smart" – and towards solutions that we know actually work: Transitioning to chemical-free agriculture, focusing on methods that promote soil health, supporting community-based farming and food marketing systems, and redirecting federal incentives away from industrialized producers towards farmers utilizing regenerative and agroecological methods.

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[7] Coming Clean, Environmental Health Alliance for Chemical Policy Reform, and Material Research (2022, September 20). *Preventing Disaster: Three Chemical Incidents Within Two Weeks Show Urgent Need for Stronger Federal Safety Requirements.* https://comingcleaninc.org/assets/media/images/Reports/Preventing%20Disaster%20final.pdf

[8] Guarna, Olivia (2022, September). *Exposed and At Risk: Opportunities to Strengthen Enforcement of Pesticide Regulations for Farmworker Safety*. https://www.vermontlaw.edu/sites/default/files/2022-09/Exposed-and-At-Risk.pdf

[9] Crippa, M., Solazzo, E., Guizzardi, D. et al. Food Systems are Responsible for a Third of Global Anthropogenic GHG Emissions. *Nat Food* 2, 198–209 (2021). https://doi.org/10.1038/s43016-021-00225-9

[10] United States Environmental Protection Agency. *Global Greenhouse Gas Emissions Data.* https://www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data

Thus we are calling for a Farm Bill that reduces harmful chemical exposure and meets our Environmental Justice and climate goals. This Farm Bill must center the following priorities:

1. Empower workers and provide them with necessary protections to guard against their exploitation. This includes protections against pesticide exposure, gender-based violence, and mistreatment of undocumented workers. It also must include the provision of basic workers' rights, adequate housing and water access, structures to support access to land, and disaster relief/compensation.
2. Address the historical inequities faced by Indigenous peoples whose unceded land is the foundation of the American agricultural system; Black farmers, many of whom descended from the United State's original exploited and enslaved agricultural workforce, whose ancestors were never compensated for their labor or abuse, and who continue to face barriers to land access; and farmworker communities of varying origins and ethnicities who, despite having the knowledge and skills to farm, are essentially "landless farmers" unable to benefit from the land and capital that agribusinesses control.
3. Prioritize community food sovereignty, supporting Indigenous communities and local communities of varying cultural and ethnic identities to have decision-making power over which crops are grown, which agricultural methods are utilized, and providing support to local and regional markets that ensure farmers can sell their products. Through adequate funding of the SNAP program and incentives that increase opportunities for people utilizing SNAP to access local, organic produce, Congress can help ensure equitable food access, local food sovereignty, and local markets for small-scale farmers.
4. Redirect funding currently provided through crop insurance and commodity programs that incentivize the crops, farms, and farming methods that drive demand for chemicals that are destructive to human health, the environment, and the climate. Instead provide incentives that reward farmers employing safer, more sustainable, regenerative, climate-resilient practices such as certified organic farming. These incentives must be accessible to small family farmers, young and beginning farmers, small farming co-operatives, farmers of color, and generational farmers who have already adopted regenerative practices and who have historically been left out of programs that only support farms converting to these practices without rewarding those who have developed and perfected them for generations.
5. Eliminate support for industrial-scale livestock operations (including support for false solutions such as biodigesters) that are highly-polluting and harmful to fenceline communities, workers, and our climate by redirecting conservation funds and supporting reforms that will reduce corporate consolidation in this sector and instead support independent farmers and ranchers.

Specific changes in line with these priorities would include:

I. Amending the Farm Bill's Conservation Title to explicitly protect not only soil health but also human health, addressing the ways in which both are impacted by agricultural chemical inputs from extraction, to production, to use, to disposal.

II. Strengthening the Farmworker Coordinator position within the USDA's Office of Partnerships and Public Engagement (OPPE), particularly to 1) ensure that the selection of the Coordinator is done in consultation with farmworker organizations; 2) provide sufficient resources for the Coordinator to hire staff to conduct adequate outreach to farmworker communities; and 3) make transparent the work of the Coordinator, including a separate page on the USDA dedicated to farmworkers. Themes addressed should include pesticide exposure, gender-based violence, workers rights, and treatment of undocumented workers.

III. Increase funding for the Rural Development title, making explicit improved housing facilities for farmworkers. Besides additional resources, create transparent reporting mechanisms to ensure that the money reaches the people in need. Additionally, within the Rural Development title, assure that adequate resources are dedicated to improving water infrastructure to where farmworkers live.

IV. Directing and funding USDA to conduct regular research on land acquisition, usage, and consolidation, and utilize this research to support land access for farmers who are disadvantaged in the current system. Discussions of land access must explicitly acknowledge the need to make allowances for farmworkers - many who lack status - to acquire land and begin farming.

V. Creating incentives for retiring farmers and ranchers to pass farmland to Indigenous people and beginning farmers with historical or modern ties to that land.

VI. Reinstating efforts reversed by the IRA designed to provide compensation for farmers who have been discriminated against with respect to land access and farming opportunities.

VII. Recognizing traditional, ancestral, and Indigenous farming practices as a transformative process to sustainable agriculture. Practitioners of these methods should be compensated for their contributions to agricultural knowledge and not have their knowledge co-opted, trademarked, or exploited for profit by agribusinesses.

VIII. Transitioning government funded incentives from chemical-dependent industrial commodity crops and towards supporting regenerative practices and regional food systems. Policies supporting this transition will require diversification of farming, mandatory reductions in chemical use, and increased access to both local food and jobs in rural communities. The incoming Farm Bill should return to parity prices benefiting small farmers. As in other industries, supply management must be prioritized in dairy and regional markets.

IX. Increasing funding and enforcement of antitrust regulations in agriculture and ensuring fair prices for farmers/consumers and living wages and union rights for all farm and food workers.

X. Enacting a large Concentrated Animal Feeding Operation (CAFO) moratorium and providing a voluntary buyout for farmers who want to stop the livestock/poultry by CAFO model. This would include blocking EQIP funding from going to CAFOs and manure digesters, and redirecting these funds to supporting diversified small-scale operations that rely on rotational grazing and perennial pasture.

XI. Strengthening the Packers and Stockyards Act so that it has the power to protect livestock and poultry producers from anti-competitive practices.

XII. Improving labeling standards, including by:

A. Requiring Country-of-Origin Labeling (COOL) on beef, pork, and dairy products.
B. Prohibiting imported meat products from being labeled “Product of U.S.A.”
C. Expanding testing for “raised without antibiotics” labels approved by USDA’s Food Safety Inspection Service (FSIS).
D. Requiring housing-related labels on egg products (e.g., caged)
E. Disqualifying incentives given to CAFOs through the Rural Energy for America Program (REAP) and Environmental Quality Incentives Program (EQIP).

Policies we oppose, which are not in line with the stated priorities, include:

A. Use of privatized carbon trading markets, including those subsidized by taxpayers through the Commodity Credit Corporation. These are ineffective, often increase emissions in most impacted communities, ignore the health impacts of non-carbon pollutants, and are strongly and regularly opposed by most impacted communities. Support for adopting climate friendly farming practices can instead be incentivized through direct payments under existing USDA programs such as the Conservation Stewardship Program (CSP).
B. Practices touted as “Climate Smart'' but which do not take into account the impact on local communities. For example, no-till farming that relies on genetically-engineered seeds and toxic herbicides (like Round-up, dicamba, or 2,4-D) is not a climate solution. We demand climate *just* agriculture and insist that no community can be harmed or sacrificed in the attempt to meet climate goals.
C. Carbon offsets as an alternative to required emissions reductions from industrial-scale operations, particularly those generated through use of manure digesters, biogas, biofuels, and other methods that have not been proven to effectively reduce greenhouse gas emissions, remain dependent on the use of synthetic fertilizers and pesticides, and further lock us into a fossil fuel-based economy.
D. Carbon pipelines that further climate injustice by using marginalized rural communities as a dumping ground for supposedly “sequestering” greenhouse gasses generated by ethanol plants, manure digesters, and coal plants when these emissions should be eliminated altogether.

In conclusion, fenceline and Environmental Justice communities, food system workers and farmworkers, family farmers and ranchers, and all of us whose sustenance depends on our agricultural system demand that our food, our futures, our health, and our safety are recentered as the foundation and purpose of our agricultural system. When the system is run by large-scale chemical companies, pharmaceutical companies, and agribusinesses (which are all too often the same corporations), this system is not designed for us; the solutions it proposes will continue to rely on toxic and energy-intensive chemical inputs that disrupt our climate, our soil’s resiliency, and even our own health. We demand that Congress passes a 2023 Farm Bill with human health and wellbeing at the forefront. This Farm Bill will end chemical reliance in agriculture, redirect funding towards safe regenerative practices, support independent ranchers and disenfranchised farmers, address the ongoing inequities in our food and farm system, and prioritize community-based food, economic, health, and safety needs.

Respectfully submitted by:

7 Directions of Service
Alaska Community Action on Toxics
Alianza Nacional de Campesinas, Inc.
American Sustainable Business Network
Biomonitoring Resource Center
Breast Cancer Prevention Partners (BCPP)
Center for Environmental Health
Center for Food Safety
Center for Progressive Reform
Clean and Healthy New York
Coming Clean
Concerned Citizens of Wagon Mound and Mora County
Earthjustice
El Comite de Apoyo a los Trabajadores Agrícolas
Environmental & Public Health Consulting
Environmental Justice Health Alliance for Chemical Policy Reform
Family Farm Defenders
Farmworker Association of Florida
Farmworker Justice
Food Animal Concerns Trust (FACT)
Food for Maine's Future
Friends of the Earth U.S.
Global Center for Climate Justice
Harambee House, Inc. / Citizens for Environmental Justice
Health Professionals for a Healthy Climate
Informed Green Solutions Inc.
International Center for Technology Assessment
Los Jardines Institute
Migrant Clinician Network
Moms for a Nontoxic New York
National Family Farm Coalition
North American Climate, Conservation and Environment (NACCE)
Northeast Organic Farming Association of New Hampshire (NOFA-NH)
Northwest Center for Alternatives to Pesticides
Pesticide Action Network
Public Justice
Silicon Valley Grows One Seed One Community
Socially Responsible Agriculture Project
Soul Fire Farm Institute

Texas Campaign for the Environment
Texas Environmental Justice Advocacy Services
Toxic Free NC
Toxic Free Future for Our Children
Union of Concerned Scientists
Until Justice Data Partners
Waterkeeper Alliance
Western Broome Environmental Stakeholders Coalition (WBESC)
Women's International League for Peace and Freedom US
Women's Voices for the Earth
Workers Center of Central New York