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Public Comments Processing  
Attention Docket ID No.: USDA-2021-0010

William Hohenstein  
Director, Office of Energy and Environmental Policy  
U.S. Department of Agriculture  
1400 Independence Ave SW  
Washington, DC 20250  
[cccpoocce@usda.gov](mailto:cccpoocce@usda.gov)

Re: Request for Public Comment on the Climate-Smart Agriculture and Forestry  
Partnership Program, 86 Fed. Reg. 54149 (Sept. 30, 2021), Docket ID: USDA-2021-  
0010

Dear Mr. Hohenstein:

CropLife America (CLA) appreciates the opportunity to comment on United States  
Department of Agriculture's (USDA) Climate-Smart Agriculture and Forestry (CSAF)  
Partnership Initiative.

Established in 1933, CLA represents the developers, manufacturers, formulators, and distributors  
of pesticides and plant science solutions for agriculture and pest management in the United  
States. CLA represents the interests of its registrant member companies by, among other things,  
monitoring legislation, federal agency regulations and actions, and litigation that impact  
pesticides and pest control industries, and participating in such actions when appropriate. CLA's  
member companies produce, sell, and distribute virtually all the pesticide and biotechnology  
products used by American farmers.

CLA commends USDA's efforts and initiative to advance climate-smart agricultural and forestry  
practices. The CSAF Partnership Program will unlock new markets for U.S. agricultural  
producers and support commodities grown using CSAF practices. This program will help U.S.  
agricultural producers sequester carbon, reduce emissions, and build climate resilience.

To produce more with less, growers need the best available safe and effective tools at their  
disposal to meet this challenge. Growers use pesticides as an important tool to control weeds,  
insect infestation, and diseases on their crops. Pesticides allow farmers to produce more food  
and fiber without bringing additional land into cultivation. A new analysis based on research



from over a decade suggests that agriculture should be as high-yielding as possible so it can be limited to relatively small areas, allowing much more land to be left as natural habitats while still meeting future food targets.<sup>1</sup> High yielding agriculture is possible through optimum use of agricultural inputs, like pesticides.

For many years, safe and effective pesticide tools have contributed to growers utilizing a variety of CSAF practices in agricultural production. One important CSAF practice for growers is reduced or no-till soil management, which is a pesticide-enabled farming practice. Reduced or no-till soil management is a practice where crops are grown without disturbing the soil (dramatic reduction in field plowing) and any previous seasons' crops are left in the field as mulch for the next season.<sup>2</sup> There are numerous benefits to this practice, including reduced soil erosion (by about 90%), water conservation, improved soil quality, carbon sequestration, and reduced fuel use due to fewer plowings between crops.<sup>3,4</sup> A 2020 study found that just two herbicide-tolerant crops in the United States, corn and soybeans, and their companion chemistries enabled reductions in tillage and tractor fuel, thus sequestering carbon and reducing greenhouse gas (GHG) emissions- the equivalent to removing 4.2 million cars from roadways in one year.<sup>5</sup> Additionally, growers adopting reduced, or no-till soil management methods save a combined 812.4 million gallons of fuel each year, roughly the amount of energy required annually by 3.2 million average households.<sup>6</sup>

Another important CSAF practice, the use of cover crops, is enabled by safe and effective pesticide tools. Cover crops are planted to provide a protective canopy to the soil when fields with low residue crops would normally be left bare. Cover crops protect farmland by improving soil erosion, water quality, nutrient management, forage, and/or soil quality, all while sequestering carbon in the soil.<sup>7</sup> Growers can use a variety of methods to remove cover crops, so it does not compete with their cash crop, and termination by herbicides has been used on almost two-thirds of the acreage in soybean, corn-for-grain, and cotton fields.<sup>8</sup> Again, safe, and effective pesticide tools play a large role in enabling growers to both plant and remove cover

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<sup>1</sup> Concentrating vs. spreading our footprint: how to meet humanity's needs at least cost to nature. A. Balmford. Journal of Zoology 2021, <https://doi.org/10.1111/jzo.12920>

<sup>2</sup> Soil Health Practices and No-till Farming Transform Landscapes. G. Duyck. D. Petit. USDA NRCS, <https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/newsroom/features/?cid=nrcseprd1307111>

<sup>3</sup> Seeing is Believing: Soil Health Practices and No-Till Farming Transform Landscapes and Produce Nutritious Food. G. Duyck. D. Petit. USDA NRCS 2017, <https://www.usda.gov/media/blog/2016/12/19/seeing-believing-soil-health-practices-and-no-till-farming-transform>

<sup>4</sup> A Case for No-Till Farming. D. Montgomery. Scientific American 2008, <https://www.scientificamerican.com/article/a-case-for-no-till-farmin/#>

<sup>5</sup> Environmental impacts of genetically modified (GM) crop use 1996–2018: impacts on pesticide use and carbon emissions. G. Brookes. Biotechnology in Agriculture and the Food Chain (4<sup>th</sup> ed. Vol. 11) 2020, <https://www.tandfonline.com/doi/full/10.1080/21645698.2020.1773198>

<sup>6</sup> Reduction in Annual Fuel Use from Conservation Tillage. USDA NRCS 2016, [https://www.nrcs.usda.gov/Internet/FSE\\_DOCUMENTS/nrcseprd1258255.pdf](https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcseprd1258255.pdf)

<sup>7</sup> Cover Crops – Keeping Soil in Place While Providing Other Benefits. USDA NRCS New York, [https://www.nrcs.usda.gov/wps/portal/nrcs/2011, https://www.sciencedirect.com/topics/agricultural-and-biological-sciences/no-till-farming-detail/ny/technical/?cid=nrcs144p2\\_027252](https://www.nrcs.usda.gov/wps/portal/nrcs/2011, https://www.sciencedirect.com/topics/agricultural-and-biological-sciences/no-till-farming-detail/ny/technical/?cid=nrcs144p2_027252)

<sup>8</sup> Cover Crop Trends, Programs, and Practices in the United States. S. Wallander. D. Smith. M. Bowman. R. Claassen. USDA Economic Research Service 2021, <https://ers.usda.gov/publications/pub-details?pubid=100550>



crops, which sequester carbon and improve soil quality.

Reduced or no-till soil management and the use of cover crops are two critically important CSAF practices that are enabled by pesticide tools. There have been significant climate and soil quality benefits from these CSAF practices (enabled by pesticide tools) to date, but there is great opportunity for increasing the scale and impact of these practices. A 2020 analysis found if cover crops were grown on an additional 15 percent of available U.S. cropland acres and if 25 percent of intensive or reduced tillage acres were converted to strip tillage or no-till soil management practices (practices largely enabled by access to safe, effective pesticides), an additional 29.6 million metric tons of carbon equivalent – or the equivalent of approximately 6.4 million cars – could be reduced annually.<sup>9</sup> Ultimately, the positive results from both practices help mitigate climate change and improve soil quality, resulting in an increased crop yield potential. When USDA is reviewing CSAF practices that produce climate-smart commodities, we encourage USDA to consider the role of pesticide tools in enabling CSAF practices such as use of cover crops and reduced or no-till soil management.

In addition to these conservation practices in agriculture, forests also are an essential carbon sink for mitigating climate change and GHG emissions. Pesticides play an essential role in forest management as well as protecting urban and suburban forested areas that will be impacted by all aspects of climate change. Tree planting and forests are critically important carbon sinks that mitigate climate change. Weeds reduce survival and growth of trees because of competition for resources, so timely weed control increases the survival and vigor of conservation tree plantings significantly. Chemical control through safe application of herbicides is a critical method of controlling weeds and improving successful establishment and growth of new tree plantings.<sup>10</sup> EPA-registered pesticide products provide solutions for forest and vegetation management and for management of invasive and harmful insect species that can decimate forests and urban trees. The U.S. Forest Service reports pesticides are used to protect our nation's forests – which offset approximately 16 percent of our nation's carbon dioxide emissions<sup>11</sup> – from devastating pests. Pesticides have been used to slow the spread of gypsy moths and emerald ash borer in our forests by up to 50 percent,<sup>12</sup> ensuring these important sinks can continue to serve this vital offset function. Additionally, as higher temperatures and changes in precipitation increase the ranges and incidences of insect, fungal, rodent, and other pests that can harm agriculture, forests, or human health, control tools will be essential for establishing resiliency to these heightened pest pressures.<sup>13</sup> Support for scientifically robust and predictable pesticide regulation will help ensure products are available and in development to meet climate-driven pest problems in the U.S. and

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<sup>9</sup> Combatting Climate Change on US Cropland: Affirming the Technical Capacity of Cover Cropping and No-Till to Sequester Carbon and Reduce Greenhouse Gas Emissions. E. Bruner, J. Moore, M. Hunter, G. Roesch-McNally, T. Stein, B. Sauerhaft. American Farmland Trust, <https://farmland.org/wp-content/uploads/2020/11/csequestrationreach-converted.pdf>

<sup>10</sup> Herbicide Weed Control in Windbreaks and Shelterbelts. USDA NRCS 2007, [https://www.nrcs.usda.gov/Internet/FSE\\_PLANTMATERIALS/publications/ndpmctn7587.pdf](https://www.nrcs.usda.gov/Internet/FSE_PLANTMATERIALS/publications/ndpmctn7587.pdf)

<sup>11</sup> Forest Carbon & Climate Change. USDA 2016, <https://www.fs.usda.gov/sites/default/files/factsheets-forestcarbon.pdf>

<sup>12</sup> Pesticides. U.S. Forest Service 2015, <https://www.fs.fed.us/research/invasive-species/control/pesticides.php>

<sup>13</sup> Climate Indicators for Agriculture. M. K. Walsh, P. Backlund, L. Buja, A. DeGaetano, R. Melnick, L. Prokopy, E. Takle, D. Todey, L. Ziska. USDA 2020, [https://www.usda.gov/sites/default/files/documents/climate\\_indicators\\_for\\_agriculture.pdf](https://www.usda.gov/sites/default/files/documents/climate_indicators_for_agriculture.pdf)



abroad.

The Food and Agriculture Climate Alliance (FACA), which consists of more than 80 organizations (including CLA) representing farmers, ranchers, forest owners, agribusinesses, manufacturers, the food and innovation sector, state governments, sportsmen and sportswomen, and environmental advocates, submitted comments in response to the April USDA-2021-0003-0001 request for public comment. In these comments, the group recognized climate advantageous inputs. As part of these climate advantageous inputs, the group mentioned plant protectants in combination with tillage management and other conservation practices will be necessary to meet productivity, carbon sequestration, and reduced greenhouse gas emissions goals. FACA supports continued innovations in crop and forestry protection that reduce non-target impacts, improve crop and forest productivity, and maximize the benefits toward meeting climate objectives. The group supports a strong, science-based risk/benefit regulatory system that ensures access to safe and effective tools while also promoting biodiversity on the landscape.

CLA looks forward to continuing to engage with USDA on Executive Order 14008 (“Tackling the Climate Crisis at Home and Abroad”) and the Climate-Smart Agriculture and Forestry Partnership Program. CLA commends USDA’s efforts and initiative to advance climate-smart agricultural practices and we encourage USDA to consider the role of pesticide tools in enabling CSAF practices such as use of cover crops, reduced or no-till soil management, and forestry management. Should you have any questions or comments, please feel free to contact me at [jsavoie@croplifeamerica.org](mailto:jsavoie@croplifeamerica.org) or (202)-872-3847.

Regards,

A handwritten signature in black ink that reads "Julie Savoie".

Julie Savoie  
Director, SustainabilityCropLife America