TENNESSEE FARM BUREAU FEDERATION

July 25, 2024

Dr. Seth Meyer
Chief Economist
Office of the Chief Economist
U.S. Department of Agriculture
Whitten Federal Building
Washington, DC 20460

Re: Procedures for Quantification, Reporting, and Verification of Greenhouse Gas Emissions Associated With the Production of Domestic Agricultural Commodities Used as Biofuel Feedstocks (USDA–2024–0003)

Dear Dr. Meyer,

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to comment on the U.S. Department of Agriculture's (USDA's) request for information (RFI) pertaining to domestic agricultural commodities used as biofuel feedstocks. TFBF is a general farm organization of over 694,000 members whose purpose is to represent the many diverse commodity producers across Tennessee. TFBF policy is developed through a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies on various issues.

Farmers have a deep and long-standing interest in protecting the environment based upon philosophical beliefs and practical self-interest. The environment is essential to all agriculture and our families. Land is typically a farmer's largest asset and primary source of income. Farmers have every incentive to leave this natural resource in better shape for the next generation. Modern agriculture is environmentally sustainable, and farmers strive to constantly improve the environmental resources in their care while playing a significant role in climate solutions. Success in farming is dependent on the environment. Farmers continually strive to balance earning a living from the land while being stewards of the land, air, and water. Increasingly, farmers are asked to produce more using fewer resources, all while decreasing agricultural greenhouse gas (GHG) emissions. Agriculture can play a role in offsetting emissions beyond the farm gate. From climate-smart farming practices to voluntary management of forests, grasslands, wetlands, and croplands, farmers are reducing their footprint and actively absorbing carbon from the atmosphere.

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It is of utmost importance for the farmers of Tennessee and United States that USDA ensure the commodities our farmers grow are not only eligible to be considered to be feedstocks for biofuels but are the preferred feedstock for domestic biofuel production. USDA must lead across other federal agencies, such as Department of the Treasury, Environmental Protection Agency, and the Department of Energy, so there is understanding of American farmer reality and on-farm practices. It is apparent there is limited understanding in the other agencies when we look at the current standards for eligibility for the tax credits available for sustainable aviation fuel. Information collected in this RFI can be utilized to guide the other agencies.

As USDA considers practices which have the potential to mitigate GHG emissions and/or sequester carbon, it is vital for USDA to take into account the many production practices across American agriculture. What works in one state may not work in another. Farmers face this at the farmgate - one practice works better on one field while another is better on another field on their farm. This could be because the soil type, topography, moisture capacity, disease and pest pressures, or any other variety of factors. One-size-fits-all approaches do not work.

Pertaining to quantification, reporting, and verification approaches, the USDA must consider data privacy for the farmers; if this is not considered appropriately any approach will fail. If farmers must report identifying information to various federal agencies or in the supply chain of biofuel manufacturers, there is increased potential to reveal data about a farmer at a particular location to the public. Greater access to farmer data creates serious privacy concerns. Courts have protected farmers from disclosure of personal information and have recognized farmers are unique because they generally live on their farm, meaning their business information is also personal information.

Another important concept for quantification, reporting, and verification approaches is that the individual farmer should have the opportunity to manage this on their own, use USDA staff, or the hired consultant of their choosing. Ensuring individual farmers can make this decision on their own will aid success in American farmers meeting the demand for domestic feedstock for biofuels.

A key feature of Tennessee row crop production is no-till and conservation tillage practices. Tennessee farmers grow over 3 million acres of row crops including soybeans, corn, cotton, and wheat. According to USDA’s own statistics in 2023, 79.1 percent of these crops were planted using no-till and 16 percent were planted using conservation tillage practices. This means that only 4.9 percent of Tennessee row crop acres used conventional tillage practices. Tennessee farmers have proven they are

ready and willing to be leaders in innovation. Looking forward, Tennessee farmers can and will adopt practices that work for their farm and lead to profitability, especially as a domestic biofuel feedstock.

We respectfully request USDA include winter oilseed crops as a qualifying practice. Research at the University of Tennessee Institute of Agriculture (UTIA) has shown winter canola-based sustainable aviation fuel is a promising alternative to fossil fuel jet fuel, as it could reduce the carbon footprint of aviationfuel by at least 50 percent and meets current sustainability criteria established by the Inflation Reduction Act.

The benefits of winter oilseed production can be numerous. These winter oilseed crops fit naturally to the crop rotation schedule utilized by most Tennessee row crop farms. Winter oilseeds produce high oil content seeds and, depending on the species and chemical composition, allow for use as drop-in fuel. Another significant positive is that the winter oilseeds are grown off-season from the majority of food crops. A main benefit of winter oilseed production to Tennessee farmers is the increased opportunity for profitability to the individual farmer as new cash crop. Tennessee farmers have the potential for many more acres to be double cropped with winter oilseeds according to UTIA. Not only would winter oilseeds provide economic benefits but would also provide many ecological benefits as a cover crop. As previously mentioned, UTIA has numerous researchers working on winter oilseed production and economics, TFBF would be happy to connect USDA with UTIA faculty and staff to further USDA's understanding of this research.

Thank you for the opportunity to provide comments to this important topic. We encourage USDA to unlock the ability of the American farmer to continue to grow as the supplier of feedstocks for biofuels. Tennessee farmers have a proven record of utilizing carbon reduction production practices when they understand the environmental benefits and increased profit motive. Tennessee farmers are ready to lead on providing feedstocks for domestic biofuels.

Sincerely,

Eric Mayberry
President
Tennessee Farm Bureau Federation