

June 17, 2024

**Environmental Working Group comments to the Agricultural Marketing Service, U.S. Department of Agriculture, Docket Number AMS-LP-24-0012, 5/29/2024, pages 46335-46336; Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program.**

Thank you for requesting public input about the Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program (the Program). The Environmental Working Group (EWG), a nonprofit research and policy organization with teams in Washington, D.C., Minneapolis, Minn. and Sacramento, Calif., has conducted research into federal farm policy programs for three decades. Our expertise focuses on the environmental and climate impacts of agricultural practices and farm policy programs.

It has been widely shown that most carbon offset markets do not actually reduce greenhouse gas emissions.[i] Recent research suggests that only 12 percent of global carbon credits actually result in emissions reductions.[ii] And offset projects that invest in forest protection have been shown to be of little value, with a study showing that only six percent of forest carbon offsets that are part of a major offset market have reduced emissions.[iii]

Agriculture is responsible for at least 10 percent of U.S. greenhouse gas emissions. Every other sector of the economy, especially transportation and energy, is expected to reduce emissions dramatically in the near future, which could increase agriculture's share of emissions by 2050. So, the single most important thing that farmers can do to combat climate change is to reduce their own emissions, at the source.[iv]

Sending funding directly to farmers to reduce their own emissions, outside of these markets, would have the biggest impact on the climate. However, EWG is submitting these comments to help the Program become as effective and beneficial for farmers and the climate as possible.

**Comments on Question 2 of the request for information**

Within the request for information, Question 2 asks: What metrics or standards should USDA use to evaluate a protocol's alignment with each of the five criteria to be defined in Question 1? What should USDA consider as minimum criteria for a protocol to qualify for listing under the Program?

In establishing the Program, any protocol that is included on USDA's list of "widely accepted protocols" must solve six major issues that commonly occur in agricultural offset markets. These six issues are: quantification, verification, uncertainty, additionality, permanence and transparency.

Quantification- There is considerable scientific doubt around how much carbon agricultural practices can sequester in soil or the amount of emissions that can be reduced by agricultural practices. The protocols must have proven ways to measure and quantify how much a farm reduces their emissions or sequesters carbon in soil.

Verification- To avoid selling credits for emissions reductions that did not really happen, it is imperative that farm fields are monitored to measure how much carbon has been sequestered or emissions reduced. Many protocols use models to estimate this, but they do not all use soil tests to inform their models. When companies are paying for very specific amounts of carbon sequestration, models cannot estimate those amounts accurately enough without soil tests, so the protocols should require soil tests. And it needs to be clear who will pay for soil testing, because testing costs could be a large burden for farmers.

Uncertainty- There is significant uncertainty around the quantification and verification strategies used by different protocols. The USDA should establish best practices for quantification and verification, and all protocols included on USDA's list should abide by the established best practices.

Additionality- Across all protocols, agricultural practices should be new in order to generate credits. This concept of 'additionality' is central to the protocols, and consequently offset markets, succeeding in mitigating climate change. If credits are provided for already-established agricultural practices, no new sequestration or emissions reductions will happen.

Permanence- Offset markets only work if carbon is sequestered for long time periods, and emissions avoided permanently. If companies buy credits to reduce their total emissions by a specific amount, but then the sequestered carbon is immediately released to the atmosphere, those emissions were not actually reduced. All protocols need to require permanent emissions reductions or long-term carbon sequestration for agricultural practices, when establishing offset credits.

Transparency- The protocols need to have very good transparency with farmers, the USDA and the public. They should say how exactly they use their models and soil tests to estimate carbon sequestration or emission reduction amounts and provide transparent information about the fees they or the markets charge, as well as how the farmers who get accepted into the programs get chosen.

#### **Comments on Question 8 of the request for information**

Within the request for information, Question 8 asks: What should be the minimum qualifications and expertise for a third-party verifier to qualify for registration under the Program?

Any third-party verifiers that qualify for registration under the Program need to conduct their own testing and quantification to verify agricultural offsets. It is extremely important that farmers are not self-verifiers - requiring farmers to self-verify would be asking too much of farmers in time and expertise, and it would also delegitimize the offset credits.

Third-party verifiers should also be people or groups that are not connected to the farms they would be verifying. It would be a conflict of interest if a local agricultural group were verifying the offsets of farmers that were included in their group's membership, or friends or family. So, verifiers need to be independent people or organizations, and they need to conduct their own testing and measurement on farms.

EWG appreciates the opportunity to comment and urges the USDA to implement effective requirements on protocols and third-party verifiers to improve the potential climate impact of the Program.

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[i] <https://www.csis.org/analysis/whats-plaguing-voluntary-carbon-markets>

[ii] <https://www.research-collection.ethz.ch/handle/20.500.11850/620307>

[iii] <https://www.science.org/doi/10.1126/science.ade3535>

[iv]

<https://www.ewg.org/news-insights/news/2023/02/will-agriculture-be-americas-leading-source-greenhouse-gas-emissions>