

Comments Received on Regenerative Agriculture Definition*

Comment Period: December 2024

*These are written comments received via email to RegenerativeAg@cdfa.ca.gov or through chat box via public listening sessions. Written comments submitted in the Zoom chat box during public listening sessions and work group sessions will be posted elsewhere. You may submit a written comment at any time to RegenerativeAg@cdfa.ca.gov. Comments will be posted at the end of each month.

Date	Written Comment
12/3/2024	<p>We have seen the devastating effects of over-industrialized foods on the health of Americans. This includes pesticide exposure and nutrient depletion in food farmed with conventional industrial practices. We aim to participate constructively in new solutions that orient America’s food system towards human health, and we believe that the mass adoption of regenerative agriculture plays a critical role in that goal. To that end, we commend CDFA’s effort to define regenerative agriculture so that the state can better support farmers who are doing the vital work of transforming our food system to one that supports healthy people and a healthy planet. As currently proposed, the definition has positive attributes but is sometimes misdirected. In previous drafts, the definition was more explicitly defined by meeting targets. This version focuses on practices in the final paragraph and implies that the state will select practices “based on the best available science and practice, including organic and traditional ecological knowledge, for production systems.” Instead, we believe that farmers should choose their own practices and be acknowledged as regenerative should they meet the defined targets. A target-focused definition allows for the necessary innovation to create new techniques and develop technologies to scale regenerative practices. While we support a target-focused definition, the targets themselves must be sufficiently meaningful.</p> <p>Our first recommendation is that soil health be a required target. No operation should be considered regenerative without reaching a soil health target. The central tenet of regenerative farming is that improving and preserving soil health makes all the other targets possible. Soil health is the primary outcome of regenerative</p>

agriculture. It cannot be sidestepped, or else the other positive benefits of this style of farming would not be possible and not be regenerative.

Our second recommendation is that within a soil health target, a specific requirement exist to “improve soil microbiome.” Currently, the target promotes an increase in biodiversity. However, biodiversity includes all organisms, while soil health is tied explicitly to the available microbiology. An increased number of insects, invertebrates, birds, and other life are noble and likely outcomes of regenerative agriculture. Still, microbial diversity is central to the regeneration and critical to the transition.

Our third recommendation is that the following targets be removed: “Build healthy local communities.” “Maintaining positive impact on the economic vitality/livelihoods of farmers and ranchers.” “Minimizing negative impacts to other target outcomes.” Our objection is not that these aren’t noble goals. We absolutely believe that these are good outcomes and likely outcomes from a transition to regenerative agriculture. However, these targets create a giant loophole where any operation could easily greenwash its way into being labeled regenerative. A profitable conventional farm can “maintain a positive impact on the economic vitality/livelihood” of a farmer. A farmer can “minimize negative impacts to other targets” by merely concocting more damaging scenarios than what one’s regular operation does. Thus, doing nothing would be sufficient to meet the target. While we want farmers and rural communities to have vibrant economic livelihoods, these provisions don’t do anything toward that end except water down the definition to become potentially meaningless.

Our final recommendation is that each target be given a tiered framework. First, farms should be able to qualify as reaching targets for improving over baseline conditions. For example, reducing pesticide or fertilizer use would still have value to the farm operation, even if they can’t entirely remove these inputs. Second, a high-grade absolute target can be set that would reward farms that have already undergone their transition to regenerative and, therefore, wouldn’t be able to qualify via the improvement target. For example, if a farm has already eliminated the use of

	pesticides or is at a sufficiently low quantity, it would be considered hitting the target without any need to demonstrate improvement over time.