Comments Received on Regenerative Agriculture Definition*
Comment Period: August 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
8/21/24	To begin, it's important to note that this felt like an odd and impossible task. As consumers and climate leaders advocating for healthier food and local food systems, we support rapid adoption of "regenerative agriculture" for human and planetary health. At the same time, there is a *sacredness* that goes beyond a definition. What we are collectively trying to define is a relational tending to natural elements and processes—which are innately complex, ever-changing, and impossible to prescribe. It is in this spirit that we provide the following input: Regenerative agriculture is a mindset for food and farming systems that requires a deep understanding of and respect for the ecology of the land and seeks to work within that ecosystem. The tender of the land continuously seeks to be one with the land, thoughtfully listening and responding with care. Farmers and ranchers engaged in regenerative agriculture focus on tending the soil as a first principle, using practices that continuously improve the soil's health over time in production. These stewards understand that soil vitality is paramount to achieving ongoing land resiliency and productivity, and supports the wellbeing of the broader ecosystem, farmworkers, farm animals, and those who enjoy farm and ranch products. They cultivate healthy soil systems by perpetuating the growth of living plants and soil microbes that absorb carbon from the air and store it in the soil. While there is no specific recipe, common regenerative agriculture practices include cover cropping, compost

	application, crop diversity, animal integration, chemical input reduction or elimination, and minimal soil disturbance. The result is healthy, nutrient-dense foods and a vibrant ecosystem teeming with life and natural productive capacity for the land to sustain future generations. Healthy lands (as well as rivers, lakes, and oceans) thrive without the necessity for people to mine nutrients; manufacture fertilizers, apply pesticides and herbicides; transport water great distances, or hire bees seasonally. While some of these practices may be necessary to utilize as a temporary boost, a regenerative farmer and rancher continually works to deeply understand and enhance the land's natural abilities to grow food and provide healthy ecosystem services: a natural water supply, local pollinators, biodiverse soil, a balance of wildlife.
8/21/24	The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace. Over 20% of OTA's members are based in California, where the state boasts over 1.9 million acres of certified organic land, and over 90% of households stock organic food. California leads the nation in organic farmgate sales, exceeding $3.5 billion annually, with more than 28% of farmers planning to expand their organic production within the next five years. Independent research from the University of Pennsylvania has shown that "Organic Agriculture Hot Spots"—counties with clusters of organic businesses—boost local household incomes by an average of $1,014 and reduce poverty and unemployment rates compared to other agricultural areas. 74% of the organic agricultural hot spots are in California. This thriving organic marketplace benefits Californian producers, enabling farmers to succeed despite a lack of investment in State and Federal technical assistance, research, or private funding. Similarly, it benefits California consumers seeking increased access and availability of organic food. It is crucial that the California Board of Food and Agriculture seriously considers input from the state's organic

	farmers, ranchers, and processors, who are key contributors to the economic success of the Golden State. Our detailed comments address the following topics: □ The Regenerative definition is still incomplete □ The definition lacks specificity □ The definition doesn't address an integrated approach □ The definition lacks accountability The definition does not align with plurality of public comment received □ A pathway to enhance the definition proposed The regenerative definition is incomplete We appreciate the Work Group's dedication to advancing the definition of regenerative agriculture. We recognize the complexity of balancing diverse perspectives to arrive at a comprehensive definition. However, we are concerned that the current wording falls short of a complete definition. While the outcomes listed provide valuable insight into what specific practices in regenerative agriculture aim to achieve, they lack clarity on essential criteria, such as which outcomes are mandatory, the minimum metric thresholds, the number of outcomes that must be met, and whether certain outcomes hold more weight than others. Similarly, without specific metrics, practices, or priorities outlined, this definition does not provide the necessary guidance for effective implementation or verification. It leaves farmers uncertain about how to practically implement these guidelines. We believe the definition remains Incomplete. The definition lacks specificity This definition, as it stands, leaves room for varied interpretations and it is not clear it has been scenario tested to understand if it will provide the guidance needed to add value. While we understand the need for flexibility across production environments, scale, ecoregions, and cultural regions there also needs to be enough structure to define what is and is not regenerative. For instance, would a farmer be considered regenerative if they adopt just one healthy soils practice? Or if they observe a modest increase in soil organic matter? What if a farmer adopts one regenerative practice but overapplies nitrogen or otherwise engages in practices that are counter to the outcomes described? How does the definition apply to certified organic farmers and are organic farms afforded regenerative "credit" for having implemented practices widely recognized as regenerative? Similarly, how does the definition apply to Healthy Soils Program

	participants? And what about those who are actively working to address all the targeted outcomes? The ambiguity in these scenarios underscores the need for clearer guidelines on what it truly means to be regenerative. The definition does not address an integrated approach the introduction mentions an “integrated approach” but what follows is an a la carte menu of outcomes related to specific or singular practices as compared to an integrated farm system management approach. It misses an opportunity to recognize the value from stacks of practices, integrated management, and guidance for farmers in how to approach regenerative work beyond an a la carte selection. Balancing diverse target outcomes such as improving soil health and maintaining economic vitality might create conflicts, particularly if practices that improve one area have negative impacts on another. For example, what happens if these attributes have tradeoffs against each other, such as fostering animal welfare at the cost of increased greenhouse gas emissions? The document should address how these trade-offs will be managed. Beyond missing the value of integration, the definition offers no guidance on integration, priorities, or trade-offs. The definition lacks accountability While the definition acknowledges the importance of processes, practices, monitoring, evaluation, and innovation, there is a lack of accountability. With no indication of how a farmer will be held accountable for incorporating the elements of the definition, there are inherent challenges in implementation of these actions. Who will be responsible for monitoring and evaluating these practices? Will the State allocate resources to support this effort? How will these outcomes be standardized or implemented across diverse agricultural systems and regions? Without specific criteria or measurable indicators, the outcomes will be difficult to evaluate in practice. While organic standards are written to be adaptable to a variety of production systems, the organic certification system requires third-party verification and annual inspections, essential elements to ensure and maintain integrity. Similar mechanisms should be considered to uphold the standards of regenerative practices. The definition does not align with the plurality of public comment to date. A significant portion of public input has come from organic stakeholders expressing concern about the ambiguity of this definition. Many have called for organic standards to serve as the baseline, ensuring a strong foundation of accountability and rigor. However, this definition as currently proposed does not appear to align with the public input received. It falls short of establishing the robust accountability and

	clear thresholds needed to define what truly constitutes regenerative practices. A pathway to enhance the proposed definition Many stakeholders in the public comment process, including the OTA, have expressed support for the 'Pathway to Regeneration' model proposed by California Certified Organic Farmers (CCOF). This model provides a more defined framework for many of the outcomes listed in the current definition and could be further refined to create the clarity, accountability, and verification necessary to ensure farmers are adopting sufficient practices and outcomes to be considered regenerative. This approach would help address how regenerative agriculture outcomes will be integrated with existing farming programs and verification schemes. We urge the Work Group to incorporate the 'Pathway to Regeneration' as outlined in CCOF's coalition letter. We recommend a tiered approach that reserves the definition of regenerative for farmers who fully adopt regenerative systems, such as organic certification, while also establishing a pathway that recognizes and supports farmers at various stages of their journey.
8/21/24	I am sure I am not the only small former who believes in organic farming, but questions the reason for continuing to farm due to the lack of income from the labor spent. CCOF believes in the need for inspection. I am not against inspection but the cost is prohibitive to making even a meager income from farming.
8/22/24	In four seasons, we went from watching rainwater run over the top of our pastures, eroding silt and topsoil into the nearby creek, to virtually a 100 percent infiltration rate. In contrast, many of our neighbors truck in potable water because their wells have gone dry. In addition, we have seen an exponential rise in the numbers of native pollinator species, shrubs and trees that have been able to thrive with improved soil structure. I have also spent the last 10 years organizing regenerative land management workshops and sustainable equine management workshops for folks in my community. I work closely with our local RCD's, the NRCS, and the SF Bay Water Quality Control Board using lessons learned from Allan Savory, HMI, and the folks from Understanding Ag/Soil Health Academy (Gabe Brown, Dr. Allen Williams and others). I mention all of this because, after listening to all

	past public comment sessions, including the workgroup recordings, I am not hearing the voices of the hundreds if not thousands of other small family farmers like myself who are already implementing regenerative practices, but who did not know these sessions were happening. Through my educational outreach, I have come to understand that conventional farmers and ranchers — those who hold the majority of farmland in California — are generally not willing to implement regenerative practices until they are shown that doing so is economically feasible, and ultimately advantageous. Because we are going to need a large segment of them to come on board in order to solve our water, diversity loss and climate crises, I believe that the definition of regenerative agriculture needs to include its potential economic benefit as a means to incentivize. This would also acknowledge the pressure that farmers and ranchers now face because of higher costs and less available water. In addition, the NIH claims that suicide rates among farmers in California and other states are two to five times higher than the general population. In light of this, I have submitted my own working definition (see below), hoping it is useful to the workgroup. My effort was to get to the heart of what regenerative agriculture actually is, and to communicate its significance. I've embedded links that define terms used in the definition, thinking that a final definition published on a CA dot gov website could also serve to further educate farmers and ranchers, particularly conventional producers. Their participation is desperately needed, as is the awareness of much of the public who know little of farming and ranching, and how it can harm or heal our lands and ecosystems. My question: has there been an effort to reach out to the educators and leaders in the field who have already transitioned millions of acres to regenerative practices throughout the United States and beyond over the last 30 years? I feel that there not only needs to be a broader base of understanding among the workgroup of what regenerative ag is, ***but how it is applied*** in order to come up with the best definition for a state as influential as California. I believe a number of those educators would be willing to help in this process.

	Finally, at the bottom of this email are links to the most recent scientific peer-reviewed papers, published this year, on regenerative agriculture. The data for these studies were collected on actual working farms and ranches managed adaptively as a whole system and in context, not in a lab nor under controlled environments using a formulaic approach. I have also included a link to a 2024 4-part documentary that follows a number of these scientists as they collect, record and process data over a period of years on five regenerative farms ***and*** on five neighboring conventional farms where their findings were then compared. The documentary also captures the lives of the people on each of those farms, and what motivated them to begin a transition to regenerative practices.
8/22/24	I know next to nothing about farming. Some days, I think, "Who am I to be talking about soil health in the farm bill or promoting regenerative agriculture as a nature-based solution to much of what ails our world?" I do it because I believe it's right. I'm writing today because healthy soil is the provenance of healthy food. And because healthy soil provides even greater gifts that nothing—not tech or AI or industrial wizardry—can replicate or improve on. One of the biggest crises our nation faces is the ever-increasing power of consolidated corporate entities, including in food. These powerful entities seek our dollars and cause harm while valuing quarterly profits over real human needs. The definition of regenerative agriculture is critically important to turning that around, because we need real food, produced by farmers and ranchers who live on and intimately know the soil, its capacities, and its needs. To build a better future for California's food and agriculture system, the definition of regenerative agriculture must: • Protect the integrity of the practice of regenerative agriculture—and this is paramount. The definition, principles, and practices should not be easily diluted, expanded, or greenwashed for commercial advantage. • Concisely offer an overarching description of regenerative agriculture that centers on the continuous improvement of soil health over time in production.* • Expand on the definition with key criteria and details. • Be adaptable enough to accommodate research results as they emerge around, for example, the measurement, monitoring, and verification of soil carbon increases and payment for improving that ecosystem service.

	• Meet the informational needs of each audience the definition will reach, for example, consumers. • Describe and differentiate between the principles and practices of regenerative agriculture. Why? Organizations describe them differently, and that's confusing. Consumers must know what regenerative agriculture means at a basic level. They will drive the market for the product, and they need to know the reasons why they will love that product, get behind it, and talk about it (e.g., nutrient-density, better for the environment, free of chemicals and GMOs, kinder to farm animals). They may also lobby for policies that support regenerative agriculture, as I do now. If the definition is to be used in regenerative certification, it should be accompanied by inspections that certify the application of the principles and practices, particularly the reduction and eventual elimination of all synthetic chemicals. I deeply appreciate this opportunity to provide input into a process that is vitally important to California's status as an agricultural leader, the state's agricultural economy, the health of rural communities, the future of food, the environment, and our existence on the planet. *Agriculturist and author Charles Massy expresses this well in the following passage from "The Call of the Reed Warbler: A New Agriculture, A New Earth." Note key points in italics: "Regenerative agriculture therefore implies *more than just sustaining something but rather an active rebuilding or regeneration of existing systems towards full health*. *It also implies an open-ended process of ongoing improvement and positive transformation.* This can encompass the rebuilding or regeneration of soil itself, and of biodiversity more widely; the reduction of toxins and pollutants; the recharging of aquifers; the production of healthier food, clean water and air; the replacement of external inputs; and the enhancement of social capital and ecological knowledge."
8/23/24	We applaud the Department of Food and Agriculture for undertaking the complex and contentious task of defining "regenerative," a now widely used term for an agricultural system that aims to address many challenges and opportunities linked to food, fiber, and fuel production. As is our tradition, California is again leading the way and certainly will impact the rest of the nation and the world through your work. This definition, like "organic," will continue to move farmers and ranchers into the role of problem solvers. This framing of the farmer and rancher role in society is critical to meeting California's 30x30 and other sustainability goals. It will help ensure our state can continue to feed the nation for as far into the future as we can imagine. The widespread adoption of regenerative production promises to significantly contribute

	to combating climate change, recharging aquifers, recovering species, renewing rural and local economies, improving the lives of livestock, and improving the nutrient density of food. All of these outcomes will save our state and nation billions by reducing costs for repair of climate disruptions, protecting species, and treating diet-related disease. Below, we offer our official position on how the state should define regenerative agriculture in accord with the Legislature's request, the public's interest, and the market's growing demand. We believe that ▪ The promise of regenerative agriculture is that it can move 50-70% of farmers and ranchers to think agroecologically, with an emphasis on soil health, in the next ten to fifteen years. Soil health must be the primary goal now given the need to capture carbon and precipitation in soil for longer periods and to increase soil fertility resulting from soil organism and above ground biodiversity on our working lands. ▪ State funding to aid farmers and ranchers wanting to begin or to expand regenerative practices is critically important. We do not believe that high rates of regenerative adoption would be possible with a definition that requires organic as a baseline practice. Our belief is based on the organic system adoption rate as witnessed over the last 60 years. Evidence points to farmers' perceptions of risk as the intractable impediment. A regenerative definition distinct from organic will be an easier way to move people down a road that leads toward regenerative organic production, which we see as the current high bar. Thus, state funds to support transition to regenerative or support for expansion of regenerative should not require an organic baseline. ▪ New programs aimed at promotion and support of regenerative production that might emerge from a legal definition should be seen as distinct from our current groundbreaking climate smart programs such as the Healthy Soils and State Water Efficiency and Enhancement. These programs are invaluable and have contributed to improving California agriculture, but they are narrowly focused on only one component of a farming or ranching system. Regenerative agriculture arises from a holistic, biological, and social mindset that aims to spawn synergies from the complex interactions between humans and species, and the mineral and water cycles underlying ecological system function and upon which continuous economic success ultimately depends. Therefore, new programs that promote and/or expand regenerative practices should aim to support

	measurable impacts on human health, local economies, soil health, species diversity, and water use. ▪ Regenerative organic certification has already distinguished itself from organic certification, they are defined differently. We believe this is driving more innovation and will move some significant numbers of currently certified organic farmers and ranchers to do even more in order to become regenerative organic. Therefore, we believe a spectrum definition of regenerative that recognizes levels of practice will cause positive competition in a similar way. A spectrum allows those pursuing the path to test the risks they feel they will face at a pace they themselves choose. ▪ Although it would be more complex, a definition that includes a spectrum of regenerative practice levels would be our preferred outcome. We believe that with good science, time, and public investment it can be done. If such a path were pursued, we recommend additional consultation around whether levels of state investment should be calibrated to differing levels of regenerative practice. Funding levels could be used to further incentivize the move toward regenerative organic practice. Recognizing that a spectrum is complex and could require additional time, we would not want to extend the process of arriving at a basic definition. Rather, the definition offered by the current process should be accompanied by a message from the Secretary and State Board that indicates the promise of a truly regenerative system will require refinements that accelerate adoption and improve outcomes in local economies and on the land. We recognize that this may also mean the Legislature will need to provide funds to continue the work of refining and updating the definition. We would support such Legislative action. ▪ A spectrum definition would also align with our hope that any state-funded program that supports purchase of regenerative products for K-12 educational institutions should require the high bar of regenerative organic as the baseline. This is because we need to protect our state's children from pesticide residue. Such a provision could also create motivation for producers to pursue regenerative organic certification. Again, we thank the Department for its inclusive process to define the term regenerative in ways that will allow robust public investment to scale its adoption across the state. We know it will impact the nation and the world and further prove that as stewards of working lands and our food system, farmers and ranchers are the foundational providers of civilization.

8/23/24	The definition of regenerative farming must remain 100% focused on soil health. Now is not the time for scope creep. As a state and as farmers, our goal must be to farm in a way that not only preserves soil health but also supports the many natural cycles influenced by healthy soil, which have far-reaching impacts beyond the farmer's field. The framework for soil health has long been established and includes the following principles: 1. Know your farm and crop context. 2. Maximize the presence of living roots. 3. Minimize soil disturbance. 4. Maximize soil cover. 5. Maximize biodiversity. 6. Integrate livestock when possible. No plants, no life. If we are not talking about maximizing photosynthesis and promoting and sustaining life in the field, we are not talking about soil health, and we are certainly not talking about regenerative agriculture. While organic farming, worker welfare, and DEI initiatives are important to society at large, they are not relevant to the definition of regenerative farming. There is a significant opportunity to improve soil health on farms—and, therefore, the environment—through the widespread adoption of the soil health framework. We already face the challenge of changing the mindset of "this is the way it has always been done." Let's not add to this challenge by burdening farmers with major baseline changes like converting to organic. Focusing the definition of regenerative farming solely on soil health—using the well-established and proven NRCS framework—will be far more effective at creating meaningful positive change for the environment. Ten conventional farms that adopt regenerative farming practices based on soil health principles can have a greater positive impact than a single farm converting to organic standards. Let us maintain a clear, actionable definition that prioritizes soil health, thus enabling widespread and meaningful environmental improvements.

8/24/24	I have followed the discussions about creating a state definition of "regenerative" and want to echo the following concerns: While I am grateful that the State has been supporting "carbon farming" and other "climate friendly" practices through the Healthy Soils program and other initiatives, I strongly believe that labels for any particular operation must meet clear standards and be certified by a third party. • Clarify that all the target outcomes must be met and verified. • Strengthen the language in the target outcomes to say **eliminate reliance on synthetic pesticides**. While requiring organic certification as the baseline to regenerative was not embraced by the entire working group or the science advisory panel, we believe we must embrace the language of organic farmers. • The state must develop a plan for how the definition will be implemented. Without effective monitoring and evaluation, there is tremendous risk of greenwashing. We endorse the Regenerative Pathway as an alternative.
8/28/24	Thank you for your deliberate efforts to engage stakeholders in defining “regenerative agriculture.” While those in agriculture are clearly impacted, this definition has potential ramifications far beyond the stated scope of California’s state policies and programs. Indeed, your work may significantly influence whether regenerative farming actually delivers the sustainability outcomes our planet so desperately needs. It is in that context that we respectfully offer the following comments in response to your invitation. As a globally impactful nonprofit farm certifier, A Greener World (AGW) promotes practical, sustainable solutions in agriculture by supporting farmers and educating consumers. We believe the way we farm, the nutritional quality of the food produced—and the impact of farming systems on wildlife, the environment and wider society—are all connected. Our growing family of trusted certifications validated by on-farm, third-party audits includes Certified Animal Welfare Approved by AGW, Certified Grassfed by AGW, Certified Non-GMO by AGW and Certified Regenerative by AGW.

	Having developed a regenerative standard ourselves (through an intensive five-year process and two-year pilot program), we understand the challenge of creating a definition that is both precise enough to be meaningful and inclusive enough to be impactful. As one of the strongest regenerative standards, we further understand that it would be unfair to limit 'regenerative' to AGW's definition alone and that there must be a range of options to ensure change is accessible. With that, we support aspects of the CDFA Regenerative Agriculture draft definitions but would like to offer the following recommendations based on our decades of experience in agriculture and certification. From our perspective, in order to have reliability or impact, a definition of "regenerative agriculture" should meet the following three essential criteria. Broadly speaking, at minimum, to be considered "regenerative" a claim should be: 1. Meaningful in expectation and impact. Any regenerative definition should require high standards of animal welfare and pasture- and range-based production, which is notably absent from the draft definitions. Feedlots and confinement systems are not regenerative and should be specifically and unambiguously excluded. A truly regenerative system of animal husbandry should not rely on industrial interventions like routine antibiotics and physical mutilations, high-grain diets for ruminants, or breeds which are developed for maximum production in industrial confinement at the expense of animal welfare. For further guidance on animal welfare standards, we invite you to review A Greener World's certifications linked above. We support comprehensive definitions of soil health and biodiversity, with a focus on maintaining living roots. All too often 'regenerative' is conflated with increases in organic matter, yet soil health should encompass more than soil carbon. Biodiversity—including soil biodiversity—is key to a healthy ecosystem, and measuring regeneration should include this vital ecological metric. Genetic modification should be avoided and prohibited. Regenerative should also address the human and social fairness elements of agriculture, as well as impacts on water and air (both in quality and greenhouse gas emissions). Inputs should be rigorously evaluated for risk to the metrics above and prohibited or restricted as appropriate, with time-bound, quantifiable and verified reductions over time. Outcomes should be measured, monitored, and managed for continual improvement.

	2. Validated by an independent third party. Rigorous third-party certification (of standards aligned with #1 above) should be required as a measure of progress, along with quantifiable, meaningful and verified goals and metrics. Pledges, self-certification and checklists do not work at the policy level or the scale of impact needed. Certification should be administered by reputable certification bodies with audits occurring every 18 months at minimum, incorporating regular physical, onsite inspections and following conformity assessment principles. Without this essential criteria, “regenerative” will continue to fall victim to the same greenwashing that has already undermined other sustainability claims and stymied progress in implementing better agricultural practices. 3. Inclusive of different regions, climates, and production systems. To reach the level of impact needed, “regenerative” must meet people where they are. While we are supporters of Organic agriculture, we believe regenerative farming should invite everyone on a meaningful and accountable transition path toward greater sustainability, not just those who are already certified Organic. Regenerative approaches should be place-based, taking into account the specific context of each farm. A regenerative definition should also explicitly recognize Traditional Ecological Knowledge as qualified expertise. Finally, regenerative should be considered holistically and systemically, not as a menu of practices or target outcomes. Improving soil organic matter in isolation, for instance, does not necessarily lead to regenerative outcomes for the ecosystem. If target outcomes are used, we suggest clarifying the extent of adoption needed to be considered “regenerative,” and at minimum a majority of target outcomes, as well as continual progress to reach ecosystem equilibrium. While the first two criteria are relatively straightforward and self-evident, we believe the third deserves additional discussion in the current context. According to FiBL, certified organic land represents less than 1% of U.S. farmland and just over 2% in Canada. In total, just 1.6% of global farmland is certified organic. With the overwhelming environmental and social challenges facing us, we can’t afford to preemptively exclude the vast majority of land stewards. What if we could restrict and reduce agrochemical use, increase soil cover and biodiversity, lower tillage and emissions, and improve worker and animal welfare on the other 98.4%? The opportunity to be considered “regenerative” should not be limited to those with Organic certification.

	Starting from an Organic baseline will only limit the impact of 'regenerative' to a thin slice of an already-small pie. Further, organic standards do not require the benchmarking of metrics like soil health, water or air quality, wildlife species and habitats, social fairness, nor measurement over time to show improvements (or otherwise). It is a widely accepted goal of regenerative agriculture to reduce on-farm inputs as the foundation for farm fertility and integrated pest management are built into the system. This intentional reduction of inputs is not found in organic certification. Current USDA Organic standards also do not promote the responsible, high-welfare use of antibiotics, as the complete prohibition on antibiotic use creates the unfortunate incentive to withhold treatment from sick animals to preserve access to the Organic market. The resulting dilemma is unfair, unnecessary and unacceptable for both farmers and animals. Regenerative systems should promote animal health, prohibit routine, subtherapeutic antibiotic use while permitting targeted, therapeutic treatment when needed (as in European Union Organic standards and AGW certifications). Certified Regenerative by AGW addresses all of these principles and more, and a farm can apply both organic and regenerative approaches simultaneously and maintain both certifications. When aligned with the criteria above, regenerative can offer a pathway for farms to transition to organic—while getting credit for their current sustainable practices. With deep respect for organic methods, we recognize the broader benefits of extending regenerative beyond organic farms. Organic practices should be valued and rewarded—and are, through the Organic label. Regenerative practices—which are complementary but distinct from Organic—are also valuable and should likewise be rewarded, independently of organic certification. What we call 'regenerative' practices today are rooted in millennia-old indigenous agricultural traditions that predate organic. While no definition or certification can fully encapsulate this foundational intimate connection to agriculture, we believe regenerative claims meeting the three criteria above can be meaningful, pragmatic and impactful, bringing transparency to food production and the opportunity to create positive change at scale. We sincerely hope you will utilize this definition process toward that goal.

8/30/24	Regenerative Agriculture is a variable agricultural system that uses multiple strategies for developing and supporting a health soil system using techniques like ground cover with a variety of grasses and plants, the presence of stock animals and a system of growing tree crops and other food, including grains or vegetable with minimal or no chemical or fertilizer use and seeds that allow variety and natural growth of plants that may involve compost of variety of food and agriculture waste, diverse wood chips or other fertilizers from livestock or plant composting and no-till or very low till techniques for minimal disturbance of fungal networks in the soil. Aeration of the soils that does not displace soil layers may be needed to allow earth worms and other soil components access to upper soil areas and best penetration of rainwater and air into soils. A variety of plants, animals, agroforestry crops and timber may be the most ideal regenerative system, including bees and a variety of animals that impact and enhance the system and can provide multiple sources of income to a farm. as well as multiple protections for soil and lands. Use of heavy equipment that compacts soil should be limited to specific areas not meant for yearly crops and should be kept to a minimum.