

Comments Received on Regenerative Agriculture Definition*
Comment Period: September 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
9/2/24	<p>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. The California Poultry Federation represents 99 percent of the chicken industry and 90 percent of the turkey industry in California. We are also home to the National Poultry Improvement Plan, where we certify flocks and birds as healthy and disease-free as they move across state lines and outside of our country's borders.</p> <p>Our poultry farmers believe that healthy food comes from healthy and happy animals. Our commitment is to ensure the well-being of our poultry, their environments, and our employees. We want to make a difference by promoting and implementing sustainable farming practices, which include animal welfare, soil health, and enhancing the ecosystem and air quality while providing health care and optimal environments for our employees.</p> <p>Some key farmers have developed a regenerative farm plan already, and they understand the challenge of creating a definition that is both precise enough to be meaningful and inclusive enough to be impactful. We support aspects of the Cdfa Regenerative Agriculture draft definitions but would like to</p>

offer the following recommendations based on knowledge and experience of the poultry industry.

From our perspective, to have reliability or impact, a definition of "regenerative agriculture" should include the following criteria:

1. Any regenerative definition should require high animal welfare standards with pasture- and range-based production, which is notably absent from the draft definitions.

Implementation of having a third-party animal welfare certificate or setting a broad-based animal welfare standard to ensure the well-being of the animal

2. 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, considering each farm's specific context. Regenerative should be regarded 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 that needs to be considered "regenerative," and at minimum, a majority of target outcomes, as well as continual progress to reach ecosystem equilibrium.

We strongly believe that organic practices deserve additional discussion in the current context. According to the USDA, only around 1 % of American farmland is currently certified as organic, meaning that less than 1 % of the total agricultural land in the United States is used for organic production. With the overwhelming environmental and social challenges facing us, we can't afford to exclude the vast majority of land stewards preemptively. What if we could have a farming system that fostered an intentional and thoughtful use of agrochemicals to reduce their reliance and use, increase soil cover and biodiversity, lower tillage and emissions, and improve worker and animal welfare on the other 98 percent? The opportunity to qualify as "regenerative" should not be restricted to those holding Organic certification. Restricting "regenerative" to an organic baseline limits its impact on an already small segment.

	<p>With deep respect for organic methods, we recognize the broader benefits of extending regenerative practices 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.</p>
9/5/24	<p>While an agreed-upon definition is helpful for the market, the current list of seven goals for "regenerative farming" are a woeful attempt at posturing. This list of goals neither helps consumers know how what they were purchasing was farmed, nor does this list of goals provide a framework for farmers to commit to better farming practices.</p> <p>In order to provide consumers with honest information about their food, and in order to hold farmers accountable, the goals should first of all be limited to <i>farming</i>.</p> <p>Secondly, these goals should be focused on what is <i>regenerative</i>. I find it striking that there is nothing in these goals about soil health, microbial activity, ecosystem stability, diversity of plant and animal species, oxygenation of soils, let alone carbon sequestration.</p> <p>Lastly, these attempts to define "regenerative farming" clearly serve to greenwash big food producers. If they can simply meet "goals" by hiring a diverse board of directors, or providing box tops to help alleviate the effects of poverty in poor school districts, it will be easy to "purchase" the use of this term.</p> <p>The more painstaking, costly, and yet vital responsibility of regenerative farming should be ensuring the health of our soils, and thereby the health of consumers, and the health of those who farm the land.</p> <p>As long as large agriculture corporations are able to tick boxes without actually doing the more involved work of stewarding the land they are responsible for, the term "regenerative farming" will be a misnomer and will only serve to enable bad farming practices, which therefore result in poor labor practices, and poor consumer choices.</p>

	<p>I therefore strongly urge the CDFA committee writing these goals to stick to what concerns <i>farming</i>, and to focus on practices that are truly <i>regenerative</i>.</p>
<p>9/12/24</p>	<p>We commend the CDFA's eXorts in developing a comprehensive definition of regenerative agriculture. The draft definition aligns with many of our core principles, particularly:</p> <ol style="list-style-type: none"> 1. The integrated approach acknowledging the interconnectedness of farming and ranching practices with broader ecological systems. 2. Recognition of Indigenous stewardship and traditions. 3. Comprehensive target outcomes covering ecological, social, and economic aspects. 4. Flexibility in implementation based on specific contexts and production systems. <p>Based on our experience working with over 100 farmers, representing 250,000 acres across 23 states, we offer the following suggestions to strengthen the definition:</p> <ol style="list-style-type: none"> 1. Soil Health Focus: While the draft definition mentions soil health, we recommend emphasizing it as the foundational principle of regenerative agriculture. Our approach begins with understanding current soil health through baseline testing and provides ongoing feedback through annual in-field soil testing and triennial lab tests. 2. Farmer-Centric Approach: We suggest highlighting the importance of farmer education and empowerment in the definition. Regenerative agriculture should focus on providing farmers with the tools and knowledge to make informed decisions about their land management. 3. Continuous Improvement: Rather than specifying time-bound reductions, we recommend emphasizing the principle of continuous improvement. This aligns with our approach of regularly updating farm and field plans based on soil test feedback and changing conditions. 4. Inclusivity: We strongly support the draft definition's inclusivity. Based on our experience, we believe regenerative agriculture should be accessible to all farmers, regardless of their current practices or certifications. <p>This includes:</p> <ol style="list-style-type: none"> a. Recognizing diverse production systems, regions, and climates. This is essential for achieving landscape level transition to integrated soil

health practices that can deliver climate, water, biodiversity and farm economic benefits at scale.

b. Valuing both scientific and traditional ecological knowledge.

c. Not requiring organic certification as a prerequisite for regenerative agriculture. Regenerative organic is the north star and SCI was one of the first endorsers of the Regenerative Organic Certification.

Additionally, of all the initiatives we've worked on over the years for transitioning acres to organic, starting with a regenerative, soil health focus has been the most successful. At the same time, in order to achieve the climate, water and other benefits of regenerative systems, we need a regenerative definition that can recognize diverse production systems.

d. Recognizing the diXerence between land management and food system management. Regenerative agriculture is a land management strategy for solving climate, water and other of the most serious crises facing the world today. Organic is a commitment to families for the quality of their food. As such, organic must be specific and exclusive. To get the landscape benefits of regenerative agriculture, there can be many approaches, and even at the beginning stages of transition, the scale benefits of regenerative are extraordinary. As Dr. Rattan Lal, globally recognized soil scientist points out, that "a mere increase in soil organic matter by 2% in soils globally can reduce atmospheric carbon below industrial levels, and every soil can achieve this." In short, while regenerative organic is the north star as a land and food management system, to achieve the essential benefits of regenerative management for people and the planet, the definition needs to focus on soil health from a land management, not a food system management perspective.

5. Peer Learning: Consider including the value of farmer-to-farmer peer networks in the definition. We've found that facilitating these networks significantly supports the adoption and refinement of regenerative practices.

6. Holistic Outcomes: While the draft definition covers many important outcomes, we suggest emphasizing the interconnectedness of these outcomes. In our experience, improvements in soil health often lead to cascading benefits in water management, biodiversity, and farm economics.

7. Adaptive Management: We recommend explicitly mentioning the importance of adaptive management in the definition. Regenerative

agriculture requires farmers to continuously observe, interpret, and adapt their practices based on the specific responses of their land.

8. Economic Viability: While the draft mentions economic vitality, we suggest emphasizing the long-term economic sustainability of regenerative practices. Our work has shown that building soil health can lead to increased farm resilience and profitability over time.

By refining the definition along these lines, California has the opportunity to promote a form of regenerative agriculture that is both impactful and widely adoptable. This approach can drive positive change across a broad range of agricultural land, improving soil health, ecosystem function, and rural livelihoods on a significant scale.

We know there has been much debate about whether the regenerative definition should have organic as a foundational requirement. At the risk of adding to that discussion, we believe regenerative organic should be recognized as the north star and not as a starting requirement. As noted above, our focus is on, “extending the invitation to farmers to transition more land” as said by Doria Robinson. At the same time, with organic representing only 1% of the approximately 900 million acres farmed nationally, and with transitioning to organic being a significant barrier to the majority of producers, we have a long way to go to get the benefits of regenerative agriculture at scale and need a more inclusive definition that can also overcome barriers of transition for growers. As advocates of and educators on organic farming, it was a long, multi-stakeholder process – inclusive of farmers, soil scientists, processors, food companies and consumer advocates -- for us to reach this conclusion. We hope that CDFR does as well.
