



National Association of State Departments of Agriculture
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June 28, 2024

Bruce Summers
Administrator
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave. S.W.
Washington, D.C. 20250

Re: Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program Request for Information (RIN 0581-AE29)

Dear Administrator Summers:

NASDA appreciates the opportunity to respond to the U.S. Department of Agriculture's (USDA) request for comments on the Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program. NASDA was proud to support and endorse the introduction and passage of the bipartisan Growing Climate Solutions Act, which authorized USDA to establish this new program, and we are pleased to see the agency begin the implementation process.

NASDA represents the commissioners, secretaries, and directors of the state departments of agriculture in all 50 states and 4 U.S. territories. State departments of agriculture are responsible for a wide range of programs, with conservation and environmental protection among their chief responsibilities. NASDA is also a steering member of the Food and Agriculture Climate Alliance (FACA), founded in 2020 to ensure that stakeholders across the agriculture and forestry value chain have a seat at the table in federal climate policy discussions. NASDA supports the recommendations and comments related to this request for information filed by FACA.

State departments of agriculture are united in support of federal climate policies and programs that are voluntary, producer-driven, and incentive-based. Such climate programs, designed to increase agricultural productivity and incomes sustainably, help farmers and ranchers build resiliency and climate mitigation and adaptation and reduce greenhouse gas emissions where possible. Investing in research, incentive programs for voluntary practices, and technical assistance will equip farmers and ranchers with additional options to protect and conserve natural resources through on-farm practices that reduce greenhouse gas emissions, increase carbon sequestration, and adjust to a changing climate.

NASDA supports a greater role for states in implementing and enforcing the Growing Climate Solutions Act, or any climate programs developed and implemented by USDA. State departments of agriculture serve as ideal partners for leading policy development and convening industry perspectives on resource, conservation, and climate programs in individual states. If the USDA Program is to be successful, policies must be developed and informed by trusted, non-partisan individuals with experience in farming, a deep understanding of conservation programs, and a demonstrated ability to work with all levels of government. NASDA members serve as co-regulators with federal agencies on conservation, environmental protection, and the promotion of economic sustainability of agricultural producers, and have a long history of demonstrating the strength of cooperative federalism.


As with many conservation programs, NASDA recognizes, at times, a shortage of qualified and interested individuals to fill these critical positions in states and regions. We encourage USDA, in the development of qualifications for Technical Assistance Providers (TAPs), to require a high level of understanding of the applications of voluntary carbon credit markets in the agricultural sector at large, but specifically the applications of such markets to specific states and/or regions. NASDA encourages state the involvement of state departments of agriculture in identifying TAPs to meet state-specific needs in implementing the program. In addition, NASDA encourages collaboration with state departments of agriculture to assist with identifying regional third-party verifiers to meet this need.

NASDA appreciates USDA for proactively engaging and seeking input from state departments of agriculture as part of the establishment of the Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program. As the voluntary carbon marketplace continues to evolve, regular, meaningful stakeholder engagement must remain a priority. We encourage USDA to continue offering opportunities for public input for all participants as well as adequate time to develop stakeholder comments as the rulemaking process to stand up this Program moves forward.

In addition, we urge USDA to move forward with the establishment of the Advisory Council expeditiously and to include state directors, secretaries, and commissioners of agriculture, their staff, and other relevant state agencies with the Advisory Council. There are a host of important stakeholders who will help inform the Advisory Council's activities, and it is crucial to include the state perspective as part of that stakeholder engagement and inclusion.

NASDA is encouraged by USDA's desire to move forward expeditiously with implementing a robust and successful Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program. We look forward to continued collaboration and outreach as the Program develops.

Sincerely,

A handwritten signature in black ink, reading "Ted a McKinney". The signature is written in a cursive style with a large, sweeping loop at the end.

Ted McKinney
Chief Executive Officer
NASDA