



Transfarmation

MERCY FOR ANIMALS

Transfarmation Farm Bill Platform

Acknowledgements:

We operate within a diverse and vibrant ecosystem of organizations working toward a just and sustainable agriculture system. We thank the following organizations who met with us during the development of the platform to share the needs of their constituencies and their goals for the next farm bill:

ASPCA, Campaign for Family Farms & the Environment, Environmental Working Group, Food and Water Watch, Friends of the Earth, Government Accountability Project, Institute for Agriculture & Trade Policy, National Sustainable Agriculture Coalition, National Young Farmers Coalition, North Carolina Environmental Justice Network, and Plant Based Foods Association.

**While these organizations helped inform this work, the platform should not be construed as shared priorities of these organizations.*

Introduction:

WHAT IS A TRANSFARMATION?

The repurposing of a concentrated animal feeding operation (CAFO) to create a **sustainable and profitable plant-focused farming operation.**

ABOUT THE TRANSFARMATION

PROJECT: The Transfarmation program works with farmers, local technical consultants, and research universities to **design new agricultural models** that demonstrate the viability of factory farms **transitioning to more lucrative, sustainable, and compassionate plant-focused farming** in order to co-create a new food future **free from the confines of industrial farmed animal production.** We match enrolled farmers with local technical consultants and industry experts to design **individualized farm transition plans**, to document those transitions, and to create public-facing resources from these experiences to serve as guiding models for other farmers to easily replicate.



Our platform includes specific support for contract livestock and poultry growers transitioning to specialty crop production and farm bill changes that will create an environment in which independent farms thrive.

Throughout the platform, we use the term “farm transition” as shorthand for climate-smart farm transitions, a process of shifting from high-emissions to low-emissions practices that includes transitioning CAFO agriculture to lower-emission specialty crop production.

As we request additional resources to support farm transitions, it is essential that existing and increased government support is equitably distributed. If this funding is not available and accessible to Black and Indigenous farmers and all farmers of color, then we risk further oppression of these communities within our food system. Similarly, we advocate for increased transparency and accountability in USDA oversight for all of the following recommendations to ensure funding is meeting its stated purpose.¹

Lastly, our recommendations are focused on what is actionable for Congress in the farm bill reauthorization—we do not include some federal priorities, such as worker rights and EPA reforms, because they are out of the jurisdiction of the farm bill and USDA. However, the well-being of workers and frontline communities is central to the work of Transformation and to reforming our food system.

Overall priorities:

- Ensure **conservation programs** support farm transitions and climate change mitigation and adaptation.
- Invest in sustainable agriculture **research programs** to increase knowledge and adoption of practices that build a more resilient and fair agriculture system and that create new market opportunities for producers.
- Expand **local and regional food programs** to bolster markets for small and mid-scale producers.
- Level the playing field for producers by ensuring **competition** in our food system.

In-depth priorities:

1. Conservation Programs (Title II)

USDA's conservation programs provide significant cost-share dollars for farmers implementing practices that protect water, soil, and wildlife, preserve ecosystems, and help farmers impacted by natural disasters. These programs should be leveraged to support climate-smart farm transitions and to increase adoption of practices that mitigate climate change and increase the resiliency of our agricultural system.

PRIORITY:

Make climate-smart farm transitions an approved conservation practice for Environmental Quality Incentives Program (EQIP), which would include the retrofitting of industrial hog and poultry farming into specialty crop production.



The EQIP High Tunnel program could help contract livestock growers retrofit their existing infrastructure to meet new market demand for specialty crops, but the conversion of existing poultry or hog houses does not meet the practice standard requirements.

- Expand the EQIP statute to explicitly allow for the conversion of existing infrastructure and recycled materials as a cost- and space-efficient means of implementing conservation practices.
- Reintroduce the definition of “structural practice” and explicitly allow for the conversion of existing infrastructure to be included under the term.
- Allow crops not grown in the soil profile (raised beds, hydroponics, etc.) to be eligible for conservation programs.

EQIP and other conservation programs continue to be oversubscribed, with fewer than half of applicant projects receiving funding. Between 2010 and 2020, just 31% of farmers applying to EQIP were awarded contracts. Yet almost 10% of program dollars are going to support CAFO agriculture that is known to pollute air and water and contribute to climate change.² Animal waste storage facilities are listed as conservation practices under EQIP despite the recognized effects these facilities have on emissions, sedimentation, and water inefficiency. To ensure we have adequate funding to support farm transitions and climate-smart practices, we advocate for the following changes to the conservation title:

- Restore conservation program funding to pre-2014 levels. The 2014 farm bill cut \$6 billion from the conservation title and the 2018 farm bill maintained this lower funding level.³

² Sec. Kirstjen M. Nielsen, *FY 19 Budget in Brief* (Washington, DC: U.S. Department of Homeland Security, 2019), <https://www.dhs.gov/sites/default/files/publications/DHS%20BIB%202019.pdf>.

³ H.R.2534 Climate Stewardship Act of 2021.

¹ S.96 Justice for Black Farmers Act of 2023.

- Provide \$2 billion annually to EQIP for new contracts.
- Reduce subsidies to CAFO operations through EQIP and other USDA conservation programs.
 - Reinstate the 1996 farm bill provision that prohibited EQIP funding from going to new or expanding large CAFOs, or reassess the classifications of certain livestock-based practices as conservation practices.
 - Increase oversight for eligible practices to ensure funding is targeted to practices that improve environmental quality.
 - Disallow the use of funds for anaerobic digesters for CAFOs from any USDA program.
 - Remove EQIP's 50% livestock set-aside to allow for more availability of funding for specialty crops.
- Assess and eliminate conservation practice standards that fail to reduce greenhouse gas emissions.
- Permanently prioritize greenhouse gas reduction, carbon sequestration, and adapting to, or mitigating against, increased weather volatility within EQIP.⁴
- Improve access to Natural Resources Conservation Service (NRCS) programs for beginning, socially disadvantaged, and veteran farmers and ranchers.
 - Increase the CSP and EQIP set-asides for beginning and socially disadvantaged farmers and ranchers to 30%.⁵
 - Require NRCS state directors to conduct significant outreach to farmers of color to meet their set-aside.
 - Establish EQIP payment limits of \$200,000 for any five-year period to increase overall producer participation.⁶
 - Provide 100% advanced payments for qualified farmers so that capital investment is not a deterrent from program participation.

Native Americans have been practicing stewardship of our natural resources since time immemorial. We support the recommendation of the Native Farm Bill Coalition to allow a Tribe or group of Tribes within a state or region to develop traditional, ecological, knowledge-based (TEK) technical standards that will control the implementation of all conservation projects allowed under the farm bill.⁷

2. Credit (Title V)

The Farm Service Agency provides essential credit to the agriculture industry—as the lender of last resort, it is designed to prop up farmers who would otherwise not receive funding from traditional banks. Where and to whom this funding is accessible and directed creates the agriculture system we see today. The farm bill gives us an opportunity to shift this funding away from CAFO agriculture toward resilient specialty crops. It also gives us an opportunity to right historical wrongs and ensure this funding reaches farmers of color equitably.

- Enact a prohibition on direct lending for new large CAFOs. Many of the largest FSA guaranteed loans finance the construction of CAFO infrastructure. In addition to polluting water and contributing to climate change, CAFOs pose significant public health risks as zoonotic disease outbreaks are caused by overcrowded conditions. Poultry and hog CAFO buildings are owned by producers who lack ownership of the animals, feed, veterinary services, and transportation. In other words, they lack the control to ensure they are able to repay their debt.

⁵ Agriculture Act.

⁶ Agriculture Act.

⁷ Erin Parker et al., *Gaining Ground: A Report on the 2018 Farm Bill Successes for Indian Country and Opportunities for 2023* (Prior Lake, MN: Shakopee Mdewakanton Sioux Community, 2022), 32, https://www.nativefarmbill.com/_files/ugd/8b3589_763e8879ac2842c0baa45c586ddfd83a.pdf.



Beginning farmers and farmers of color experience disproportionate challenges accessing USDA's conservation programs. Past discrimination, lack of equitable outreach, and lack of culturally relevant technical assistance at USDA all contribute to decreased program access for these underserved farmers and ranchers. Beginning and limited-resource farmers are also often unable to access EQIP funding due to the initial financial investment requirements. As we increase funding for conservation programs and prioritize climate-smart practices, we must also ensure equitable participation.

⁴ Similar language in H.R.2803 Agriculture Resilience Act, Climate Act.

- For those contract growers who are not able to pay off their construction loans via contract poultry and hog production, FSA should provide debt refinancing options as well as 0% interest rate loans for converting infrastructure into more economically viable specialty crop production.
- Increase accountability for implementation of existing credit programs, including greater transparency of program implementation outcomes, such as demographic data and accessible avenues for redress for farmers who face discriminatory lending.
- Ensure that all FSA loans for large CAFOs undergo an environmental assessment that entails no negative impact to communities prior to approval.



3. Rural Development (Title VI)

Rural Development programs should be harnessed to support the transition to a decentralized, vibrant, and resilient food system.

- Reauthorize Rural Business Development Grants (RBDG) and direct USDA to simplify the application and reporting requirements to increase program accessibility. RBDG grants support the development of rural, small, and emerging businesses and can be particularly useful as farmers look to transition their businesses for increased viability.
- Invest in rural broadband infrastructure by providing grants, loans, and loan guarantees to finance the cost of the construction, improvement, and acquisition of facilities and equipment for broadband service in rural areas.⁸ A lack of connectivity in rural areas limits producers' ability to leave commodity farming for more lucrative direct-to-consumer and specialty crop agriculture.
- Fund farm and food worker job retraining to support the growth of specialty crop and plant-

based markets rurally. Farm and food workers in the CAFO system face limited growth opportunities and dangerous working conditions. Instead, they could be contributing to more resilient, decentralized agriculture as specialty crop growers and workers. One program, the Rural Community Development Initiative (RCDI), helps community development organizations, low-income rural communities, and federally recognized Tribes finance housing, community facilities, and community and economic development projects in rural areas. The grants can be used for workforce development planning and should be leveraged to support farm transitions.

- Utilize Rural Development grants to support worker cooperatives. Several RD programs, such as the Rural Development Cooperative Development Grant, Socially Disadvantaged Group Grant, and Rural Business Development Grant programs, could include a focus on worker cooperatives. Congress should increase funding to expand support and technical assistance for worker cooperatives, with a focus on immigrant farmworkers from Latin America.

4. Research Programs (Title VII)

The farm bill's research programs support innovation in U.S. agriculture and invest in the development of techniques and practices that lead to more sustainable production and increased farm viability.

Research programs present an important opportunity to learn best practices for farm transitions, from industrial animal production to specialty crop production, as well as a chance to support farmers undertaking such transitions. These farmers need access to high-quality research and education to pivot their operations and decrease their environmental impact while meeting consumer demand for emerging specialty crops and plant-based products. For example, supply chain issues and rising inflation warrant new research into how farmers can retrofit existing infrastructure for alternative crop production.

But public investments in agricultural research have declined by roughly a third since 2002.⁹ To transform our agricultural system to become fair and sustainable, we must increase investments in sustainable-agriculture research, prioritize projects that lead to climate change mitigation and adaptation, and fund new research on farm transitions.

⁸ H.R.4374 Broadband Internet Connections for Rural America Act.

⁹ USDA Economic Research Service Annual Report, FY 2022.



Agriculture and Food Research Initiative (AFRI)

- Fund AFRI and provide mandatory funding.
- The next farm bill should create a new climate change adaptation and mitigation subprogram within AFRI to support agroecological production systems such as agroforestry and organic and regenerative systems. This subprogram should include a focus on climate-smart farm transitions, including research into best practices for transitioning high-emissions CAFO agriculture to lower-emissions specialty crop production. This focus would enable AFRI to fulfill its mission to improve rural economies, mitigate impacts of climate variability, and ensure food safety.

Sustainable Agriculture Research and Education (SARE)

- SARE should be reauthorized with mandatory funding of at least \$100 million annually.¹⁰
- The next farm bill should create a new SARE Agriculture and Food System Resilience Initiative, including research, education, extension, outreach, and farmer and rancher research and development with \$50 million annually in mandatory funding and authorization of appropriations of \$20 million annually.¹¹ This new initiative should include a focus on climate-smart farm transitions.
- SARE should establish climate change mitigation and adaptation as research focuses.¹²
- Increase equitable program outcomes by expanding SARE's regional councils to include a representative from an 1890 land grant institution, 1994 land grant institution, Hispanic-serving institutions, Alaska Native-serving, or Native Hawaiian-serving institutions.¹³

¹⁰ H.R.9667 Sustainable Agriculture Research and Education (SARE) Modernization Act.

¹¹ SARE Act.

¹² SARE Act.

¹³ SARE Act.

Supplemental and Alternative Crops (SAC) Competitive Grants Program

Contract livestock growers may be able to retrofit their existing infrastructure to grow hemp. SAC should become a permanent program to research adoption of hemp production and assist more producers into taking advantage of this market opportunity.

- SAC should receive mandatory funding in the next farm bill.

Organic Agriculture Research and Extension Initiative (OREI) and Organic Transitions Program (ORG)

- The next farm bill should provide mandatory funding for OREI at \$100 million annually by the end of the 2023 farm bill to ensure that the organic industry continues to grow.¹⁴
- The next farm bill should formally authorize ORG and increase discretionary funding to \$20 million by the end of the next farm bill.
- The next farm bill should expand OREI priorities to include projects related to reducing greenhouse gas emissions, increasing carbon sequestration, improving soil health, and raising soil carbon levels.¹⁵

Urban, Indoor, and other Emerging Agricultural Production Research, Education, and Extension Initiative

As many contract growers seek to repurpose their indoor growing space for crop production, this research program may help identify new pathways to success for indoor production. Many of the practices, from infrastructure repurposing to environmental remediation, are also relevant to urban agriculture.

- Increase funding for the UIE Initiative.
- Add language to the program purpose to include "determining and developing emerging agricultural production to support farm transitions."

¹⁴ H.R.2534 Climate Stewardship Act of 2021.

¹⁵ Climate Act.

Specialty Crop Research Initiative (SCRI)

Transitioning contract growers are pursuing specialty crop production as a way to escape exploitative contracts and take advantage of demand for fruits and vegetables.

- Increase funding for SCRI.
- Add language to support use of funds to research transitions to specialty crops.

As we expand research programs into sustainable agriculture, we must center racial equity across the REE mission area and increase investment in underserved and minority-serving institutions. Indigenous people and African Americans are the original innovators of sustainable and regenerative agriculture practices. Accordingly, our research programs must honor Indigenous knowledge, recognize traditional ecological knowledge-based conservation, and ensure equitable participation by and compensation and consultation to BIPOC-led and BIPOC-serving research institutions, higher-education institutions, Tribal organizations, and nonprofits.¹⁶ We echo the Native Farm Bill Coalition's request to expand and provide full funding for the Federally Recognized Tribal Extension Program (FRTEP) and to provide parity to TCUs in the research title.

5. Local and Regional Food (Title X: Horticulture)

The COVID-19 pandemic revealed the vulnerability of our centralized agricultural system. Support for local and regional food builds resilience in the face of climate change and other disasters, as well as economic viability for rural communities. For example, the local and regional food programs in the farm bill's miscellaneous title invested in critical food system infrastructure that enabled local and regional food systems to respond to the COVID-19 crisis. These programs should be scaled to build a decentralized food system that is accessible to underserved producers and communities. For all recommendations below, we prioritize access for historically underserved and BIPOC producers and communities and recommend USDA work directly with these communities to overcome barriers to access, including through outreach and cooperative agreements and data collection and analysis.¹⁷

- Expand access to the Local Agriculture Market Program (LAMP) by increasing the program's total mandatory funding from \$50M to \$75M annually and appropriations authorization from \$20M to \$30M annually while prioritizing equitable

distribution of LAMP program funds.¹⁸ LAMP can support producers who want to take advantage of new economic opportunities by connecting them with aggregators, processors, distributors, retailers, and institutional buyers and consumers in local and regional marketplaces.

- Authorize and fund the Regional Food Business Centers Program to support farmers and small food businesses with technical assistance and business development.
- Continue the Specialty Crop Block program at its current funding level.
- Provide \$1 billion in additional funding to the Food Supply Chain Guaranteed Loans and Grants program to support local and regional vegetable, fruit, and nut processing as well as farm transitions to specialty crop processing/aggregation/storage.
- Scale the Gus Schumacher Nutrition Incentive Program (GUSNIP) and make it a permanent program so communities can access fresh fruits and vegetables and local farmers have increased access to markets.
- Fund the Community Food Projects Grant to connect low-income communities with regional food producers to promote self-sufficiency and increase food security.



In addition, we echo the Native Farm Bill Coalition's demand for increased Tribal sovereignty and self-determination so that Indigenous people can access and support the production of fresh and traditional local foods. Several recommendations from the Native Farm Bill Coalition that we want to highlight include:

- Make Tribes eligible for the Specialty Crop Block Grant Program.
- Implement Tribal set-asides of at least 10% in programs like the Local Food Promotion Programs.

¹⁶ S.96 Justice for Black Farmers Act of 2023.

¹⁷ Justice Act.

¹⁸ H.R.2803 Agriculture Resilience Act, H.R.2534 Climate Stewardship Act of 2021.

- Allow Tribal governments alongside states to authorize Tribal Organic Programs as regulators to bring parity to the National Organic Program.

USDA Procurement of Local and Regional Food

USDA food procurement programs could provide a model for sourcing local fresh fruits and vegetables. But its system prioritizes the lowest price and benefits primarily large wholesale distributors rather than independent farmers. Transformation advocates for the following structural changes to USDA procurement to open up market access to smaller, local food producers and ensure benefiting communities have access to high-quality produce.

- Authorize and fund USDA's Local Foods Purchase Assistance Cooperative Agreement Program (LFPA) and Local Foods for Schools Cooperative Agreement Program (LFS). These programs, which originated during the pandemic and should be made permanent programs, make it possible for schools and food banks to serve communities local food and support local farmers, with an emphasis on historically underserved producers and processors.
- The Commodity Supplemental Food Program (CSFP) distributes USDA Foods to low-income people aged 60 years or older by providing food to both participating states and to Tribal organizations. Authorize CSFP and prioritize procurement of fresh as opposed to shelf-stable foods.
- To ensure USDA food procurement programs support a diversity of farms, Congress should instruct USDA to allow for cost to be one of many criteria, instead of the sole criterion, for determining contract awards.¹⁹ Farmers who specialize in small production, direct marketing, organic crops, or sustainability may have higher input costs, and thus higher price requirements, than the general commodity market, and cannot compete on price alone. The farm bill should formalize a new policy that allows for a range of prices in the USDA procurement RFP process.
- Require that USDA establish purchasing targets or set-asides to support small and midsize farms and independent, socially disadvantaged, and beginning farmers and ranchers, as well as farms using organic and regenerative practices.²⁰
- USDA's vendor approval process is so

cumbersome that small and midsize farmers need support to navigate the process successfully. The farm bill should create a "wrap around" service for small farmers wishing to pursue USDA vendor approval, with both technical and monetary support. This new service could include 1) support for GAP/GHP certification by assisting with cost of initial certification and ongoing record keeping requirements, 2) support in understanding and putting processes in place to comply with lengthy contract provisions if awarded a contract, and 3) crop planning for government products, in addition to other vendor-related requirements.

- Audits and inspections for compliance performed by AMS agents are seen as burdensome to the contractors who must bear the cost of these activities.²¹ The USDA should not only provide technical support and cost assistance for compliance with these programs, but they should also create flexibility by allowing for a wider range of approved food safety audits, such as state approved audits, or documentation that the farm is in compliance with the Food Safety Modernization Act Produce Safety Rule.
- Prioritize procurement of fresh produce, as opposed to processed foods, whether via a new program or existing USDA procurement.

6. Competition (Title XII – Misc.)

Consolidation in U.S. agriculture leaves just a handful of companies controlling the market for almost every agricultural product. The outcome is lower income for farmers and higher prices for consumers. Half of U.S. poultry contractors report having only one or two integrators, which has been shown to result in lower fees for growers. Because of the limited number of integrators, many poultry growers are restricted and unable to explore other contracting or production options. Policies to strengthen competition in the livestock industry support farmers and farm communities by avoiding reliance on a few big companies, increasing work opportunities, and increasing community bargaining power.



¹⁹ Emily M. Broad Leib, *An Evaluation of the Farmers to Families Food Box Program* (Cambridge, MA: Food Law and Policy Clinic, Harvard Law School, 2021), 5–20, <https://chlp.org/wp-content/uploads/2013/12/F2F-Food-Box-Report-Online-Final1.pdf>.

²⁰ H.R.5309 Fresh Produce Procurement Reform Act of 2021.

²¹ Broad Leib, *Farmers to Families Food Box Program*, 27.

The next farm bill should:

- Support and reaffirm the ongoing USDA rulemaking process to modernize the Packers and Stockyards Act (PSA) in support of livestock and poultry growers.²²
- Strengthen antitrust enforcement under the Packers and Stockyards Act via a new USDA Office of the Special Investigator for Competition Matters.²³
- Prohibit the use of unfair tournament and ranking systems for paying contract growers.²⁴
- Make retaliatory actions or the threat of retaliatory actions a violation of the PSA.²⁵
- Establish “presumptions” against further mergers by dominant food processors and retailers. The presumption is that mergers beyond a certain market concentration have a high probability of being anticompetitive.
- Impose a moratorium on all large agribusiness, food and beverage manufacturing, and grocery retailer mergers and acquisition. Create a Food and Agriculture Concentration and Market Power Review Commission to report to Congress and the president on the consequences of market concentration and recommendations to address it.²⁶
- Reform the checkoff program by requiring the recipient organizations’ budgets and disbursements be published and audited, and by restricting their engagement with lobbying organizations that have conflicts of interest or that conduct anticompetitive activities.²⁷
- Require mandatory Country-of-Origin Labeling (COOL) on beef, pork, and dairy products. Specialty crops are required to have a COOL label. Requiring COOL on beef, pork, and dairy would decrease the power of integrators, level the playing field for specialty crop producers, and provide a powerful accountability mechanism for animal welfare abuses.²⁸
- Place the liability for responsible disaster mitigation on corporations and industrial operators by requiring those entities to register with USDA, to submit disaster preparedness plans, and to pay a fee to establish a fund focused on disaster events.²⁹

²² S.271 Farm System Reform Act of 2023.

²³ S.2036 Meat Packing Special Investigator Act of 2023.

²⁴ S.271 Farm System Reform Act of 2023.

²⁵ Farm Act.

²⁶ S.4245 Food and Agribusiness Merger Moratorium and Antitrust Review Act of 2022.

²⁷ S.2861 Opportunities for Fairness in Farming Act of 2021.

²⁸ S.271 Farm System Reform Act of 2021, S.2716 American Beef Labeling Act of 2021, S.3285 Protecting America’s Meatpacking Workers Act of 2021.

²⁹ S.272 Industrial Agriculture Accountability Act of 2023.



7. Farm and Food Worker Protections

Although historically outside of the jurisdiction of the House and Senate Agriculture Committees, protections and support for farm and food workers (including slaughterhouse workers and meatpacker workers) are essential to a fair and sustainable agriculture industry.

The Farm Bill Law Enterprise recommends that Congress use parliamentary procedure to reach an agreement that permits the inclusion of extraterritorial provisions into the final bill. Or, alternatively, Congress could consider parallel legislation modifying employment, labor, and immigration laws alongside the farm bill to ensure that we account for both the nation’s farmers **and** farm and food workers.

- Establish an immediate legal status for undocumented farm and food workers. Our agriculture system is unquestionably reliant on immigrant labor. Providing a pathway to authorized work and residency status for all farm and food workers is key to a stable agricultural industry.
- Remove agricultural exemptions from worker protection laws (the Fair Labor Standards Act in particular) so that farmworkers receive equal protection under the law.
- Secure farm and food workers’ right to collective bargaining.
- Increase USDA’s role in pesticide oversight.
- Restrict USDA payments and subsidies for producers who repeatedly violate worker protection laws.