

Just Transitions to Managed Livestock Grazing in the Midwestern U.S.: Recommendations for Policies and Programs

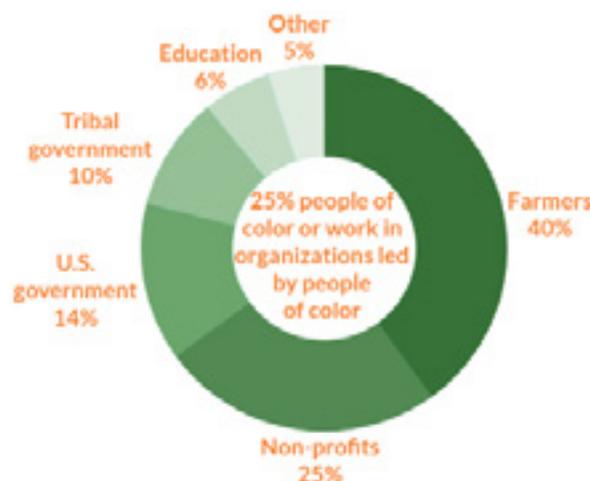
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This guide synthesizes recommendations from 128 members of the Midwest grazing and agricultural community on how federal and state agricultural policies and programs can be tailored to support managed livestock grazing and to build a more equitable food system.¹

Managed grazing refers to the practice of rotating animals through pastures, allowing each pasture to rest after grazing. The movement gives forages time to regrow, contributing to pasture productivity, soil health, reduced nutrient loss and improved water quality, and increased biodiversity. In addition to being ecologically important, managed grazing can provide economic and lifestyle benefits to farmers and rural communities. Livestock grazing is also a culturally and ecologically important practice in the Midwest region, including for many Native communities who are actively recovering the practice of grazing bison.

The purpose of this document is to share with policy advocates what we learned from community members about their experiences with grazing related policies and programs. Our intent is not to analyze these recommendations or propose exactly how to achieve them, but to amplify the voices of the community members we interviewed. A full report, which includes more detail on the background of this project and these recommendations can be found here: grasslandag.org/justtransitions. The order of recommendations in this document follows the order of the report and is not ranked based on priority.

We interviewed 128 community members across the Upper Midwest in 2020 and 2021, primarily in Wisconsin, Minnesota, Illinois, Iowa, and Michigan. We asked them about their vision for the future, and what is needed to support managed livestock grazing.



This project was produced with support from *Grassland 2.0*, a collaborative group of producers, researchers, and public and private sector leaders working to create pathways for producers to achieve increased profitability and production stability, while improving water quality, soil health, biodiversity, and climate resiliency. *Grassland 2.0* is funded by the United States Department of Agriculture National Institute of Food and Agriculture, Sustainable Agriculture Systems Coordinated Agricultural Program grant no. 2019-68012-29852.



¹ All participants quoted are listed with their position at the time of their interview.

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Federal Farm Bill Programs

Conservation Stewardship Program (CSP)

Interviewees generally expressed positive feedback about the CSP program. They particularly appreciated that it rewards sustainable farmers rather than incentivizing farmers to stop harmful practices. However, some interviewees emphasized that CSP disproportionately benefits row crop farmers relative to farmers utilizing managed grazing or other more comprehensive approaches to sustainable farming. Laura Paine, Outreach Lead for Grassland 2.0 and a Wisconsin grazer, explained that part of the problem is that *“CSP is set up to give more options to crop farmers to layer on additional payments.”* She said that many of these payments were irrelevant for grazing farms or other farms that take a more whole-farm approach to sustainability. For instance, she explained, *“Because perennial agriculture takes care of many issues, I don’t need certain management practices on my farm. This means I don’t have access to incentive payments for those practices. You get paid more per acre by having more things stacked up than for having a comprehensive grazing program.”*

Environmental Quality Incentives Program (EQIP)

“In Minnesota, it’s about two-thirds of applicants that get rejected (for EQIP), even though they would be eligible just because of lack of funding.” –Jessica Kochick, Federal Policy Organizer, Land Stewardship Project

Many farmers voiced that EQIP provides essential support for grazing farms. However, they also had suggestions for program improvements, summarized below.

Streamline and expedite the application process

Many interviewees shared that the EQIP application process is “slow and cumbersome,” with complicated rules and long, inconsistent, and non-transparent wait times. Kirsten Jurcek, a beef grazer and grazing plan writer in Wisconsin, shared that for farmers who apply for EQIP *“it can be three years before (you receive funding and) your property’s ready to have livestock,”* a length of time that many farmers are unable or unwilling to wait. This is exacerbated by a lack of NRCS employees with the expertise needed to write grazing plans, a critical part of the application process.

Eliminate the need to front capital

Some interviewees shared that fronting the cost of infrastructure investments needed to participate in EQIP, particularly on top of other program costs like grazing plans, is challenging for farmers with limited capital. While EQIP offers advance payments of up to 50% for “underserved producers,” fronting 50% of the cost still represents a substantial barrier.

Reduce infrastructure requirements for fencing

A few farmers shared that the fencing requirements for EQIP are more robust (and thus more costly) than they need to be. Scott Mericka, dairy grazer and owner of Uplands Cheese in Wisconsin explained:

“[In EQIP they] over-build everything and it costs so much damn money... a good friend of mine, he’s like, ‘yeah, in two years I’m going to go through and take out half this fence’ [because it was so over-engineered]. It cost the taxpayers more money [because they] built it so you could hold in a herd of buffalo.”

Moreover, it increases program participation costs for farmers, which can be particularly prohibitive given the requirements to front capital.

Alter program requirements to better support farmers beginning or transitioning to livestock

Interviewees voiced frustration that the EQIP program primarily supports existing graziers, rather than beginning farmers or existing farmers who wish to diversify their farms by adding livestock or transitioning to grazing from crop production. For example, grazing cover crops can provide row crop farmers the opportunity to add an enterprise to their farm or to try their hand at grazing before fully transitioning their operation. However, interviewees were told it's not possible to receive EQIP funding for both cover crops and fencing, making it difficult to fund farm diversification or transition. Moreover, farmers were told they must first have animals before they could receive support for infrastructure, like water and exterior fencing, necessary to raise them, an illogical and impractical sequence for beginning graziers.

“We are still considered non-livestock people [by NRCS]. They won't help build an exterior fence for you to confine them [and] you've got to be running cattle before they're willing to offer any help as far as watering or anything like that.”

Row crop grazier, IL

Provide more equitable support for perennial agriculture

A number of interviewees shared that EQIP is structured to support concentrated animal feeding operations (CAFOs) and row crop farmers more than managed grazing or other more holistic sustainable farming practices. Many people supported restructuring EQIP more like CSP – to pay farmers for positive outcomes rather than for reducing harmful practices. Restructuring EQIP toward a “pay for performance” approach would help even the playing field for beginning farmers who wish to start a sustainable farm and for existing farmers who have been farming sustainably for many years. Interviewees also voiced that the application process for EQIP funding is more complicated, costly, and time-intensive for some types of perennial agriculture. Wendy Johnson, an Iowa farmer who grazes beef cattle as well as farming row crops, talked about the difficulty of getting EQIP funding for silvopasture:

“We've had trouble navigating the NRCS cost-share programs for [silvopasture]... You need a grazing plan, you need an Organic transition plan, you need a silvopasture plan, and then you have to pay for these plans... You're like two years behind and the deadlines are all over the place... It's not fair that [NRCS is] so in tune with [practices for annual crops] but it's like fighting tooth and nail when you want to try [perennials].”

Increase technical support for grazing, especially for animals other than cattle

Interviewees discussed the need to provide more education to NRCS employees around managed grazing and to provide more consistent support for grazing across NRCS offices, particularly in states dominated by the corn and soybean industries. Interviewees grazing animals other than cattle were particularly frustrated by limited technical support, which also manifested in difficulty accessing NRCS programs. Interviewees shared stories of struggling with NRCS program requirements written for cattle, of difficulty finding Technical Service Providers with the expertise needed to write a grazing plan, and of an NRCS employee who required a goat farmer to purchase plants that had documented negative endocrine effects on goats.

Allow EQIP funds to be used for pasture-raising non-ruminant animals

Farmers pasture-raising pigs and poultry were frustrated that they couldn't use EQIP funding to raise their animals on pasture. While non-ruminant animals can't utilize forage like ruminants, they still benefit from a life outdoors and provide many ecological benefits. Integrating poultry into silvopasture operations or diversifying ruminant rotations with non-ruminant animals can be beneficial for soil health as well as pest, pathogen, and disease suppression. Farmers who pasture pigs and/or poultry as part of a livestock rotation with ruminant animals expressed frustration over EQIP contracts that forced them to adjust their rotations to avoid rotating chickens or pigs through equip-funded pastures.

"Pigs are the best soil builder I have. I actually take some of my bison pastures or horse pastures and put pigs in it in the fall, and wherever the pigs were, that's where [the other] animals stay all spring, because the grass is that much richer. You can actually see the color difference from where they were and where they weren't."

Dave Cronauer

White Bison Farm and farm manager at Bodwéwadmí

Farm Service Agency (FSA) and other USDA loan programs

Adjust land and income requirements for the Beginning Farmer Loan Program

"My ideal vision would be for the workers to have more opportunities. If there are employees who have been working 10-15 years in a farm, maybe banks can take that into account. Maybe the employee doesn't have a lot of money to give for a down payment, but if only the banks would take into account how long the person has been working in a particular place, that could really help us... qualify for a loan or any other type of support."

Edgar Navarro

Farmworker, Uplands Cheese

Although some farmers reported positive experiences with FSA's Beginning Farmer Loan Program, many also suggested improvements. Specifically, the program could improve land access by increasing loan limits to keep up with rising land costs and allowing leases as well as land purchases. To eliminate trade-offs between healthcare and capital access, Jessica Kochick at the Land Stewardship Project voiced the need to reduce income requirements for loans and/or to provide farmers with access to healthcare. Income requirements to qualify for FSA loans are often high enough that farmers who meet those requirements lose access to state-sponsored healthcare. As she put it,

"You're literally stuck. Even if you technically could get yourself in a situation where you could qualify for a loan to purchase this land... you're putting yourself in a position where you can't afford health care. And you're in so much debt that if anything goes wrong, you're basically just out of luck."

In addition, the Beginning Farmer Loan program should be adjusted so that more types of farm labor count as farm experience. Without this change, farmworkers and beginning farmers from non-farming backgrounds have a difficult time qualifying for Beginning Farmer Loans. As Nadia Alber, diversified grazer and Director of the Wisconsin School for Beginning Dairy and Livestock Farmers, put it:

"People can get Beginning Farmer Loans if they have some experience farming, [but] there's the catch 22. How do you get experience farming and have tax returns that show that you've been doing something in order to get a Beginning Farmer Loan?... People that don't come from a farming background... are not going to have a foot in the door as easily as someone whose parents own a farm."

Make Tribes eligible for more USDA grants for capital projects

Gary Besaw, Director of the Menominee Nation's Department of Agriculture and Food Systems shared the importance of giving tribes access to the same capital project grants as U.S. territories. He emphasized that even though Tribes are sovereign Nations and *"have legal infrastructure...that easily mirrors some of the other (U.S. territories),"* they are not eligible for this funding. Making these grants available to Tribes would help them better address infrastructure needs.

Strengthen FSA's knowledge of grazing as a profitable enterprise

"When we were proposing grazing in the late 1990s, ag lenders were not interested in that model. They did not want Jersey cows. They wanted Holstein cows fed TMR. We went to our credit union and got a home equity loan. The credit union never asked us what the money was for. We bought Jersey cows and we started grazing." –Mariann Holm, Holm Dairy Girls, WI

Grazing has been shown to improve farm profitability (largely due to lower feed and input costs) despite lower production of milk. However, graziers shared that many FSA staff have a limited understanding of grazing and that FSA programs are not well-designed for grazing operations, making it difficult to access loans. Bryce Riemer, who grazes diversified livestock at Riemer Family Farm in Wisconsin said that his bank understands grazing *"better than FSA, who does not even have boxes for some of this stuff."* To address this, expanding education for FSA employees on the economics of managed grazing and its role in mitigating long-term risk is warranted. Likewise, some people wanted to see lenders who are better versed on Beginning Farmer Loan programs and more capable of helping beginning farmers who might not currently qualify for a loan determine how to do so in the future.

Crop Insurance

Many interviewees talked about how crop insurance locks in the current agricultural system, making transformation to grazing more difficult. While nearly everyone wanted to cap crop insurance payments or eliminate the program altogether, an incremental approach was viewed as more feasible in the short-term. Suggestions included:

- Strengthening conservation compliance for farmers receiving crop insurance
- Allowing row crop farmers to keep base acres (historical acres eligible for program payments) when they transition to grazing, mitigating the risk of trying alternatives
- Supporting changes to RMA's "prevented planting" regulations to allow flexibility for grazing when weather prevents planting. By relaxing the date for when farmers can graze prevent plant acres, those who have both crops and animals would not lose value if they graze land that couldn't be planted because of a weather event. One option to achieve this change is the FEED Act.

Pasture, Rangeland, and Forage Program

The Pasture, Rangeland, and Forage insurance program is one of few insurance options available to graziers. Administered by RMA, it is intended to help cover feed losses (forage or hay) due to drought. However, interviewees voiced that the program is difficult to use effectively and emphasized the need for a better insurance program for grazing. To receive insurance payments, farmers must accurately predict the months when there will be a drought and pay for those specific months, a nearly impossible task, especially as climate change makes weather patterns more unpredictable. Interviewees were also frustrated with low program payments. An employee at the Oneida Nation Farm shared that the farm *"could buy feed cheaper than what we could buy the insurance for."*

Conservation Reserve Program (CRP)

CRP is a critical program in terms of providing habitat for a wide range of native and migratory birds, mammals, and pollinators. However, interviewees critiqued the Program for making it difficult to use grazing to sustainably manage CRP habitat. Landowners receive payment reductions for grazing CRP land, despite the fact that grazing can also be a sustainable management practice that in some cases rivals the efficacy of others, like applying herbicide, mowing, or burning to manage invasive plants.

“[Our neighbors] have been mowing off their CRP... after the nesting season every year because of the brush and weed invasion... Where our livestock graze, there’s no wild parsnip because goats and sheep and horses all love to eat wild parsnip. Cattle too. But they don’t want to take the payment reduction to have us rotationally graze our livestock on their land.” –Cherrie Nolden, Goat Grazier, 1Dr Acres Farm, WI

FDPIR 638 Self-Governance Demonstration Project

Interviewees wanted the [FDPIR 638 Self-Governance Demonstration Project](#) to be formalized as a program in the 2023 Farm Bill. This pilot project has given certain Tribes more control over what goes into the food aid boxes distributed through the Federal Food Distribution Program on Indian Reservations (FDPIR). The U.S. government used food as a tool for colonization, systematically dismantling Native livelihoods and food systems and cultivating a reliance on government food aid that persists in many communities to this day. Before the 638 project, Tribes had never been able to control the foods allocated through food aid programs. Normally, the FDPIR program sources commodity food staples from large farms off-reservation, undermining market opportunities for Native farmers and contributing to high rates of obesity and other health problems in Native communities. The FDPIR 638 Self-Governance Demonstration Project has given certain Tribes (including the Menominee and Oneida Nations in Wisconsin) control over what goes into FDPIR boxes, enabling Native governments to provide their communities with healthy, culturally appropriate foods sourced from Native farmers.

“There were a lot of foods in... those food boxes that people [couldn’t eat because they] were lactose intolerant... We had no real control. We felt that we needed to take control of the types of food because food is medicine.”

Gary Besaw

Director, Menominee Department of Agriculture and Food Systems

“To think about these program food boxes that have this good indigenous food... long grain wild rice or things like that. It’s just really emotional for us because it’s feeding our people the right things.” –Vanessa Miller, Food & Agriculture Area Manager, Oneida Nation, WI

Beyond the (current) Farm Bill

While Farm Bill policy development is crucial, many of the deeper-seated issues within the food system including human health, climate and conservation, and campaigns around immigration, Indigenous rights, fair wages, housing, retirement, and healthcare are not currently included in the Farm Bill.

Each of the recommendations below links to a section of the full report, which provides more complete background information and an extensive summary of both policy and non-policy recommendations. Corresponding sections of the report are indicated below in parentheses.

Expand farmer-to-farmer education and mentoring programs (*see Education*)

Many interviewees recommended expanding farmer-to-farmer educational networks, including grazing networks and mentoring. Some felt this was more important than investing in technical support providers and/or could make up for the current lack of capacity within NRCS and Extension. They stressed that farmer-to-farmer networks are particularly important for beginning farmers and that they are one of the most effective ways to encourage existing farmers to adopt new practices. To facilitate these networks, interviewees recommended paying farmer-mentors for their time and new staff creating roles to help organize and support farmer-to-farmer networks. A few interviewees mentioned that some farmers refuse to mentor farmers of color. Thus, investing specifically in networks of farmers of color and/or farmers who are willing to mentor farmers of color was recognized as key to supporting the next generation of farmers.

Improve technical support for “socially disadvantaged farmers” (*see Education*)

While equity has been a focus of current USDA administration (e.g., the USDA Equity Action Plan and Equity Commission), USDA has a long history of inequity and discrimination against communities of color, and there is a need to build trust and repair this damage to work effectively with these groups. As a result, NRCS, Extension, and other technical support providers have few relationships with farmers of color and the 5% of NRCS funds allocated for “underserved producers,” often go undistributed.

“We’ve found that federal and state governments do not understand Tribal agriculture... It’s a concern for us because their version of impact may be different than what ours is. Ours is just as legitimate, [but] if they don’t fully understand... we don’t score high [on grant applications].”

Gary Besaw

Director, Menominee Department of Agriculture & Food Systems

To build trust with communities of color and improve technical support, interviewees provided the following recommendations for USDA policies and programs:

- Address implicit bias and racism among technical support providers
- Hire staff from communities of color and staff who speak languages other than English
- Build relationships with trusted organizations in communities of color and distribute resources through those groups (e.g. community centers, mutual aid associations, Tribal newspapers)
- When working with non-native English speakers: allow people to verbalize rather than write; use pictures and video; reduce jargon—familiar terms like “organic” are not used in other languages

On working with Native communities:

- Learn about Indigenous agriculture; Tribal government, land, and legal structures; and Tribal priorities and how this affects program participation
- Support Tribal Conservation Advisory Councils, like the [Wisconsin Tribal Conservation Advisory Council](#) (WTCAC), and work with them to interface with Tribes
- Hire more Tribal Liaisons or others who can work with TCACs to support Native producers
- Increase funding and support for pathways programs that place students from Tribal Colleges and Universities into careers at NRCS and other agencies
- Design programs with feedback from Tribal producers and representatives, rather than consulting them after the fact
- Increase collaboration and communication between USDA agencies and the Bureau of Indian Affairs (BIA)

Make USDA programs more accessible to people in urban areas (See Education)

Cherrie Nolden, who grazes goats at 1Dr Acres Farm in Wisconsin talked about how she'd love to see USDA make its programs more accessible to people in urban areas. She suggested developing programs for grazing animals like rabbits, that can be raised on a small amount of acreage or even in a backyard. She emphasized that USDA is "*promoting yards being turned into prairies for pollinator habitat; we can do the same thing with animal production.*" She also suggested that research and demonstration farms be located near bus and bike routes. These changes could help build food literacy amongst urban consumers and cultivate interest in farming amongst people who could be part of the next generation of farmers.

Deemphasize or restructure carbon market programs to recognize the benefits of perennial agriculture (see Alternative Markets)

Many interviewees were worried that carbon markets would disproportionately benefit large, row crop farmers, CAFOs, and the companies selling carbon credits, reinforcing existing inequities and doing little to truly address climate change.

"If [carbon markets become] a main climate solution, I think [it's] going to disincentivize... transition [to managed grazing] because the carbon offset credits are going to come from just doing more of the same with some little tiny amendment... The research has not shown that these carbon market schemes actually reduce emissions. If you look at the bigger picture, it's just a profit-making scheme that I think makes people feel better." –Jessica Kochick, Federal Policy Organizer, Land Stewardship Project

Amend COOL laws and support Organic and grass-fed labels (see Alternative Markets)

Many interviewees discussed how Country of Origin Labeling (COOL) of meat products is misleading to consumers. The current law allows meat that was raised elsewhere but processed, packaged, or distributed by a US company to be labeled as US meat.

"So much of our grass-fed beef is coming in from other parts of the world and labeled product of the USA. That's a confusing piece for consumers and it makes it difficult for our ranchers to tell their story." –Daniel Suarez, Conservation Program Manager, The National Audubon Society

They also expressed frustration over the lack of USDA enforcement of grass-fed labels and the need to address long wait times (up to 6 months or more) for Organic Certification.

“FSIS (Food Safety & Inspection Service) has a definition for what constitutes grass fed...but there’s no... enforcement... We’ve seen someone feed distillers grain [to their cattle] and the advice from FISIS was... ‘when they do a label review again we’ll bring that up, or maybe you should just talk to the Better Business Bureau.”

–Adam Warthesen, Director of Government and Industry Affairs, Organic Valley

Support small, mobile, and cooperatively-owned meat processors (see Processing)

Lack of processing capacity is a serious issue in the meat industry, driving some farmers out of business. Interviewees wanted to see more opportunities for small, mobile, and cooperatively-owned processors.

To facilitate this, interviewees proposed the following recommendations:

- **Expand funding for small and mobile processing and fund facilities that process a range of animals including goats and sheep.** Funding at the Federal level for small processors can be provided through the [Food Supply Protection Act](#), [Value-Added Producer Grant Program](#). At the state level, rural development enhancement funds and tax dollars (already used to fund ethanol plants in some states) can be used to support the expansion of processing capacity.
- **Regulate small processors differently from large processors.** As Mark Bearce, CEO of Kettle Range Meat Company in Wisconsin explained, running a small meat processing facility is “*significantly more expensive for small processors than (for) larger processors*” because the “*same regulations apply to a small processor [as to] a large processor... so the costs are inherently higher for the little guy, and that gets passed down all the way along the food chain.*”
- **Hire more USDA inspectors, build more USDA-certified facilities, and ease restrictions on market access for state/local facilities.** Only ~25 states allow state-certified (as opposed to USDA-certified) processing facilities, increasing regulatory burdens at the USDA. In states that do allow state-certified facilities, farmers who wish to sell to certain markets are required to use USDA-certified facilities. This includes farmers who wish to sell across state lines and farmers selling into Federal institutional purchasing programs. Examples of Federal legislation aimed at addressing these issues include: the [Strengthening Local Processing Act](#) and the [Processing Revival and Interstate Meat Exemption Act \(PRIME Act\)](#)
- **Develop/fund education programs for people to learn the skill of meat processing.** Some states including Wisconsin and Minnesota are building capacity through technical colleges.
- **Implement anti-trust legislation and other measures to reduce industry consolidation** (see recommendations on reducing industry consolidation, below)
- **Address labor abuses in the processing industry** (see recommendations on policies that provide dignity and fair treatment for farmworkers and workers in processing plants, below)

Provide dignity for farmworkers and workers in processing plants (see *Essential Workers*)

“A lot of people... have been living here for 20-30 years, but they live in the shadows. Maybe they would like to buy their farm, but they can’t. I think in the Hispanic community, there are many people who would like to... get into agriculture [but they can’t] acquire insurance... even for a car... Just imagine how complicated it is to buy land, a farm, or animals.” –Edgar Navarro, Farmworker, Uplands Cheese, WI

Workers on farms and in the food supply chain, especially immigrant workers, are some of the most exploited workers in the U.S. Federal and state policies (or the lack thereof) put many of these workers in precarious conditions, creating and exacerbating issues with limited access to transportation, lack of housing stability, exploitative work conditions, and lack of pathways toward citizenship. Often policy advocacy around sustainable agriculture and advocacy for agricultural workers do not happen in the same spaces. However, interviewees voiced a need to better align the sustainable agriculture movement with worker advocacy.

The following summarizes a few recommendations from the interviews. More comprehensive and specific recommendations can be found in many other resources that have been prepared specifically on this topic (see *Resources section of the full report*).

- **Replace the H2-A with one that offers pathways to citizenship.** Because H-2A workers are tied to a single contract, it limits their mobility and makes it difficult for them to speak out against abuse for fear of deportation. Moreover, the H2-A program is designed for seasonal and temporary agricultural work and is therefore of little use to dairies and other farms that require year-round labor. While some dairies have started using H1-B visas to hire workers, because H1-B visas are limited to 3-6 years and there is a cap on the number that can be issued, this does little to solve labor shortages or to address the precarity of many workers’ situations.
- **Amend state ID laws.** Many workers lack access to transportation. Undocumented workers can’t get IDs because of their legal status. Because of the isolated location of most farms, workers must often depend on farm owners or others to fulfill basic needs like going grocery shopping or attending medical appointments.
- **Amend Fair Labor Standards Act (FLSA) to include overtime pay.** Farmworkers do not currently qualify for overtime under the FLSA. During the COVID-19 pandemic, some farms expanded production (taking on more animals to make ends meet), forcing employees to work harder and faster for the same pay.
- **Enforce workplace protections under OSHA.** OSHA is frequently criticized for not enforcing worker safety laws and protections in meat processing plants, resulting in severe injuries, labor abuse, and even deaths. This was exacerbated during the COVID-19 pandemic when President Trump used the Defense Production Act to allow processors to increase line speeds, exacerbating safety issues.

Provide healthcare, income support, and retirement for farmers (see *Essential Workers*)

“When farmers can’t get health care unless they pay through the nose, that’s not right... We’re not talking [about] entitlement to a fancy truck. We’re talking about basic human needs. Food, health care, and access to a decent place to live. There’s no guarantee with that and here these are the people that are harvesting our food, growing our food, transporting our food.” –Vicki Morrone, Organic Farming Specialist, Michigan State University Center for Regional Food Systems, MI

Many people expressed frustration that those who produce and process food can’t always afford food or other basic services. They asked that farm owners and workers be afforded access to basic necessities for a dignified life like healthcare (including mental healthcare), a living wage, and retirement. Relieving student loan debt would also make a big difference for both beginning and existing farmers.

Implement antitrust legislation and other measures to reduce industry consolidation (see *Consolidation*)

The food industry is one of the most highly consolidated industries worldwide, with only a few corporations dominating each sector. This creates powerful monopolies antithetical to fair and competitive markets. As food retailers, processors, and distribution companies have consolidated, they’ve captured an increasing share of profits made in the food system at the expense of farmers, workers, and consumers. Interviewees shared how these monopolies have limited farmers’ choices and forced them to accept low prices, worsened conditions for workers, and in some cases, particularly in the meat industry, increased prices for consumers.

To address this, interviewees supported the expansion of antitrust legislation. While antitrust issues were once addressed through legislative action, today this happens primarily through the courts. Because the fines imposed through antitrust lawsuits are minimal in comparison to companies’ profits, legislative action is necessary to have an impact. Specific recommendations for legislation included: developing laws that prevent vertical integration (e.g., companies can no longer own the animals they slaughter and can only slaughter one type of meat) and laws that prevent companies from merging with others after they own a certain number of market shares. While legislation is more effective than action through the courts, interviewees also suggested strengthening the enforcement capacity in State Departments of Justice by encouraging attorney generals to hire antitrust attorneys, as well as increasing corporate taxes.

Reform commodity checkoff regulations (see *Consolidation*)

Commodity checkoff funds, often federally mandated, are fees collected when commodities are produced or sold. They are overseen by 21 different member boards, each directing the checkoff funds toward research and marketing priorities. Corporate capture of checkoff funds was cited as another factor fueling consolidation in the meat industry, and giving commodity crop, animal producers, and corporations an advantage over grazing farms who don’t have a commodity checkoff. As Austin Frerick, Deputy Director of the Thurman Arnold Project at Yale University shared,

“Checkoffs [are now] a front for corporate interest. To me, it’s most clear with... pork because Smithfield owns one in five hogs. It’s the largest owner of hogs, therefore it gets most of the pork checkoffs. The “voice of Americans pork farmers” is really now the acting interest of a Chinese multinational corporation.”

Support supply management for dairy (see Consolidation)

Milk overproduction has lowered milk prices, hurting farmers' profits and creating market instability. There has been a growing call for supply management in dairy to ensure predictable, stable prices. However, because low prices benefit dairy companies, there's been little industry response. As Sarah Lloyd, dairy farmer and Supply Chain specialist for Grassland 2.0 put it,

“We’re just greatly over-producing milk. The market is not asking for this much milk (but) instead of [saying] ‘why don’t we reduce production a little bit’... the only organized government and industry response is... ‘let’s see if we can get people in Malaysia to start eating cheese.’ Why don’t we just produce less and get paid more for what we produce and not try to make Malaysian people like cheese?”

Interviewees cited policies that limit growth and promote supply management as ways to address oversupply. The [Dairy Together](#) movement has developed a [Dairy Revitalization Plan](#) and is seeking to galvanize support from Congress for supply management policy in the 2023 Farm Bill.

Develop a new program or amend the FSA’s Microloans Program (see Capital)

“We desperately need a truck. We are literally filling the tires every time we...go somewhere. It’s very difficult to find money for that kind of basic, basic stuff. I would say right now...that’s our greatest roadblock – flexibility in purchasing, especially, capital and infrastructure... We can’t get...the traditional foodways [we want] without a truck. It’s really that simple.” –Jen Falck, diversified farmer and Program Coordinator @ Menominee Department of Agriculture & Food

Farmers, particularly those with limited capital, expressed frustration about the lack of programs to cover basic repairs or infrastructure investments e.g., building exterior fencing; purchasing animals, trucks, or freezers; and covering repairs to roads, houses, and farm equipment. While FSA provides microloans to cover these types of expenses, it was notable no one mentioned this program. It is unclear if interviewees were unaware of this option or if the program was inaccessible because they didn't meet loan requirements.

Adjust grant review expectations and practices for government grants (see Capital)

Interviewees discussed the need for grant administrators to adjust expectations around grant applications and to be aware of cultural differences related to written records. Cassidy Dellorto-Blackwell, Farmer Training Program Manager at The Land Connection, talked about how she has seen many grant reviewers dismiss grant applications with small grammatical errors. This denies capital to many farmers with limited education or experience applying for grants and loans, particularly those who didn't grow up in the US. She said:

“Things are set up where you work the system [and] if you would have the education and background to work the system, it makes a huge difference... I could look at those grants and say this is a great idea. There’s bad grammar, maybe there’s some things that don’t fit, but this person has the history that says they could do it. But [some] people... are going to say ‘I don’t know, can they do it? Because they can’t write.’”

Similarly, many lending institutions may ask for farm business information that some immigrant farmers are unaccustomed to keeping written records of. Adjusting these expectations or providing more education on how to navigate the system is important. Yimmuj Yang, Community Director at the Groundswell Conservancy, talked about the power of allowing communities more leeway in determining how grant funding is spent. She said:

“A lot of advocates (are) advocating for instead of top-down grant funding opportunities, bottom-up funding opportunities. Where (the) community organization or the people that are the most in need are dictating how that funding gets used so that it is culturally appropriate [and] it’s making differences within the community.”

Finally, it was recommended that the practice of using land as collateral for loans be amended. This step was viewed as critical both because this is a documented cause of land loss, particularly among Black farmers and other communities of color, and because land under heirs’ property titles and Tribal trust land is difficult or impossible to use as collateral. The [Indian Land and Capital Company](#) has established a “full faith and credit” model where Tribes must show they can pay back the loan but do not have to put up any assets as collateral. While many questioned this model, they’ve found it works – in their 14 years of operation, they haven’t had a single Tribe default on a loan.

Support land access, particularly for farmers of color (see [Land Access](#))

Land access was identified as a critical issue by many interviewees -- 90 out of 128 mentioned it as an issue that was important and 30% stated explicitly that it was one of the biggest barriers to supporting managed grazing. They wanted to see a future that addresses historic and ongoing inequity in access to land and other resources, particularly for farmers of color whose families have been systematically deprived of land, and for others who don’t have land to inherit. The following summarizes recommendations from the interviews, but much more comprehensive and specific recommendations can be found in the many reports and briefs that have been prepared specifically on this topic (see [Resources section of the full report](#)).

- **Support land and capital distribution to farmers of color.** Some interviewees wanted to see land reparations including returning land to Native communities or other land redistribution policies. Others wanted debt relief for farmers of color or called for pathways for farmworkers to become farm owners.
- **Revise tax policies that encourage non-farmers to purchase and hold farmland.** Capital gains exemptions, use-value assessments, and low estate taxes contribute to this problem.
- **Create and enforce policies that limit farmland holding by companies, funds, and wealthy individuals outside of rural communities**
- **Amend zoning laws to reduce competition with urban development**
- **Amend crop insurance and commodity subsidies.** Crop insurance and commodity subsidies as well as lending norms disproportionately increase the profits of large, commodity farms and CAFOs, driving up land prices and fueling farm consolidation. This is a problem both for land purchases and leases – multiple interviewees shared experiences where large CAFOs or commodity farmers had outbid smaller farmers for leases by offering twice the going rental rate. Farm consolidation can create a situation where, as farms gain land they increase assets that can then be used to leverage even more capital, allowing them to acquire more land from smaller farmers who are pushed out of business.

- **Provide retirement benefits for farmers (See Essential Workers).** This would enable farmers to retire without selling their land to the highest bidder (who is rarely a next-generation farmer).
- **Strengthen existing policies and develop new policies that facilitate farmland transfer across generations.** State-level tax incentive programs and the Federal Conservation Reserve Program's Transition Incentive Program (CRP-TIP) incentivize farmers to transfer their land to beginning farmers. However, more direct policy is needed to successfully transition farmland on a large scale. Interviewees suggested a variety of ways tax credits could be used to support land transition including crediting people who rent land to beginning farmers (e.g., the Minnesota Beginning Farmer Tax Credit), people who donate land or conservation easements to agricultural land trusts, and landowners who offer long-term leases to farmers. They also suggested engaging "Buy Local" programs and food policy councils to support land transition.
- **Support farm succession planning through state Departments of Agriculture.** Departments of Agriculture in some states, e.g., Vermont, Massachusetts, Wisconsin, and Connecticut, provide technical support in succession planning.
- **Support policies that help resolve heirs' property issues.** Implement the Uniform Partition of Heirs' Property Act (UPHPA) in all states which protects property owners who are facing a forced sale of their land. Continue to fund the Heirs' Property Relending Program which was authorized in the 2018 Farm Bill.
- **Provide land linking services through state departments of agriculture or university Extension programs.** [A number of states](#) including Connecticut, Idaho, North Carolina, South Carolina, South Dakota, and Wisconsin provide these services.
- **Give Tribes and other communities right of first refusal on land sales.** Some interviewees proposed giving Tribes right of first refusal on the sale of Federal land, land within former reservation boundaries, and culturally important land. Similarly, Neil Thapar, Co-Director of Minnow, extended this idea to rural communities as a tool of returning control over rural land to the people who live there. He highlighted recent legislation in Scotland, explaining,

“There’s a tool in Scotland that allows communities to have a first right of refusal on properties. I think that mechanism is a way to steadily transfer title to land to community ownership over time. It also creates an incentive for people to [express their] vision for a particular parcel...If there’s land that’s vacant... communities can put together a proposal and...buy it. Then the local governing body...can approve that...Land that otherwise is being held just for speculation and not being put to use can be transitioned to community ownership.”

For more information on the Scottish policy, see [Using property law to expand agroecology: Scotland's land reforms based on human rights](#)

Shift social norms to emphasize the benefits agriculture can provide to farmers, communities, and the environment (see *Social Norms*)

Social norms underpin many of the issues with our food system. Norms about what “farming” looks like were used to justify the colonization of sustainable Native food systems, ideas about what a “farmer” looks like devalue the labor done by farmworkers, the commodification of land and food prevents more equitable land access, and norms around “production” and the need to “feed the world” are used to justify policies that further land and industry consolidation. Legislation and legislative language can reinforce or break down these norms. Suggestions include:

- ***Shift from emphasizing production to emphasizing farm profitability and the benefits farms can provide to communities and the environment.***
- ***Promote food to a status beyond that of a commodity.*** Use language that decommodifies food and recognizes “food as medicine” for supporting human health and healthy communities. The concept of “food as medicine” is recognized by many Native communities and is integrated or being integrated into legislation by some Tribal governments
- ***Recognize the many forms that agriculture can take,*** from raising bison, to cultivating wild rice, or tapping maple trees for syrup. European ideas about what agriculture should look like were actively used as a tool of colonization. Supporting Native communities and Native food sovereignty involves expanding the ways in which “agriculture” is conceptualized.