National Cover Crop Webinar Questions and Answers

Topic 1: Authority to enforce guidelines, consequences of not following guidelines, and how to obtain a variance from guidelines

1. Who will regulate when the crop has been terminated?

While these are guidelines, should a farmer make a claim on an insurable loss, the crop insurance adjuster could ask about cover cropping practices that were followed and if guidelines were not followed the farmer may lose all or part of their indemnity if the cause of loss could be attributed to not following cover crop guidelines.

2. What is the process for requesting a variance for producers to be able to graze a cover crop that falls under the RMA Summer Fallow termination guidelines?

As the guidelines state:

New Technology - Where new technology has at least three years of satisfactory performance (achieves historical yield) based on farm records and the written approval of two "agricultural experts" as defined by RMA, the cover crop may be terminated closer to planting, if recommended by the experts.

This means that you may be eligible for a variance if you have maintained records that demonstrate you have grazed your cover crops for at least three years and still achieve historical yields on the insured crop, and you have the written approval of two agricultural experts.

For a more details on who are likely "agriculture experts" see this link: http://www.rma.usda.gov/news/managers/2005/PDF/mgr-05-010.pdf

3. What is the RMA definition of "agricultural expert" from whom one obtains a variance from guidelines?

RMA defines "agricultural expert" as employees of university agriculture departments and cooperative extensions, and also includes state agriculture departments, certified crop advisors, certified professional agronomists, certified crop consultants, and certified professional horticulturists. For organic producers, RMA has approved ATTRA and SARE employees as organic agriculture experts.

4. Do the various agriculture crop insurance companies determine what is accepted and not accepted as far as flexibility in cover cropping or are all requests for a variance sent to RMA?

Again, see above (2). To request a variance, first obtain written approval from two RMA-approved experts, and then provide this report to RMA and your crop insurance agent PRIOR to changing practices.

5. Concerning the inter-planting definition, if a cover crop was planted within the rows of corn during fertilizer side dress time, can the corn be insured? If the cover crop were broadcast at fertilizer side dress time of corn, is the corn still insurable?

In both cases the corn would be insurable IF by planting this way it is possible to maintain separate agronomic management or maintenance of the crop, and the cover crop did not impair the yield potential of the insured crop.

7. Are there any crop insurance restrictions on aerial applied cover crop seeding into standing crop?

The insured crop would be insurable IF by planting this way it is possible to maintain separate agronomic management or maintenance of the crop and the cover crop did not impair the yield potential of the insured crop. It is generally best to aerial seed cover crops after the insured crop has reached physiological maturity.

8. If the producer attempted to terminate the cover crop and then planted the cash crop but the termination of the cover crop accidently failed, is the planted cash crop still insurable?

Yes, but you should make sure your crop insurance agent is made aware of the inadvertent failure of complete termination.

Topic 2: Termination definitions and issues

1. Define termination; is it the act of spraying or crimping or when the cover crop is dead? Could you define acceptable methods for termination of cover crops -- spray, till, mow, other?

All the methods described are acceptable so long as they result in the death of the cover crop.

2. If cover crop termination is delayed because of weather, must producers wait the full termination period (for example, 15 days in zone 2), before planting the insured crop, even if that termination pushes the planting after the late planting date?

If cover crop termination is delayed due to weather, the insured crop can be planted earlier than the stated termination period for your respective termination zone. It would be a good farming practice to be timely with your crop planting.

3. If the cover crop is part of a no-till system, termination can be delayed up to 7 days from the regular termination period guideline (90 days rule in Montana)? Could you terminate 83 days before planting?

Yes.

4. Instead of 90 days after termination in a summer fallow situation, why isn't termination timing based on cover crop physiological stage? For instance, why not just terminate cover crop prior to the reproductive stage when a cover crop begins to use lots of soil moisture, rather than an arbitrary 90 days?

The intention is to have a uniform policy in climate conditions where soil moisture has a significant impact on the cash crop that follows a cover crop, even though there is continuing research that may lead to changes in this guideline in the future. In addition, there are differences among cover crops with their flowering/reproductive times. For easier guidance, days worked better.

Topic 3: Cover crop seeding issues:

1. Would over-seeding during V5 or V6 stage not be covered under the guidelines?

The insured crop would be insurable IF by planting during this period it is possible to maintain separate agronomic management or maintenance of the crop and the cover crop did not impair the yield potential of the insured crop.

2. Does the NRCS Environmental Quality Incentive Program (EQIP) or the Conservation Stewardship Program (CSP) provide financial support for inter-seeding in northern climates to get cover crops established?

There are many types of cover cropping practices (EQIP) and enhancements (CSP) available for farmers, and it is best to check with your local NRSC office to explore these possibilities and the local technical standard for cover crops. For example, CSP offers a conservation enhancement called "intensive cover cropping in annual crops" (SQL 12) which provides support to "grow and manage seasonal cover crops of grasses, legumes or forbs to maintain soil coverage and other conservation benefits."

Topic 4: Agronomic questions and concerns

1. What impact does average annual rainfall and/or average annual monthly rainfall amounts have on beneficial results from cover cropping practice? In other words, would the results of using a cover crop be similar in lower rainfall areas like 9 - 12 inch zones when most of the moisture comes in the winter?

There is increasing research on this topic and the results do not yet provide a simple answer to this excellent question. Generally, lower rainfall areas make it more difficult, but not impossible, to use cover cropping practices. The guidelines were developed using the "Precipitation Effectiveness Index" which takes into consideration the rainfall timing, amount, climate, and distribution of the rainfall throughout the year.

2. In Rob Myers' presentation, were the yield difference noted based on replicated studies, non-replicated demonstrations, or grower reported yields on fields they felt were similar?

Dr. Myers was presenting information from a non-random survey of farmers and it is not based on replicated studies or non-replicated demonstrations. The results are suggestive of a possible difference in yields between farmers who have a longer history of using cover crops from those who do not. The full survey report can be found at: http://www.northcentralsare.org/Educational-Resources/From-the-Field/2012-Cover-Crops-Survey-Analysis

3. As we talk about potential increase of grain corn yields in non-drought and drought conditions; are there specific cover crop mixes that will maximize or reach your average yield increase potential? Are these single species cover crops, or are cocktails a better bet? Are there specific species you have found that will specifically benefit grain corn yields, which will be planted in the previous years' standing grain corn?

There is still ongoing on-farm and plot study research on this topic and there are not simple answers to these excellent questions. The species or mix of cover crops is very dependent upon your purpose of the cover crop. A local expert can assist to help plan the cover crops best suited to your situation.

4. If cover crops are only looked at when there is an insurable cause of loss of the cash crop, could there also be an incentive to farmers who do use cover crops since RMA and all these agencies have acknowledged that it is a low risk practice?

There have been some proponents of providing additional crop insurance benefits like the further lowering of crop insurance premium subsidies for those farmers utilizing cover crops. However, since in many cases, particularly major field crops, crop insurance premiums are already high, it is not known whether an additional subsidization of premium costs would be a significant incentive to motivate greater adoption of cover cropping practice.

5. Currently there is a growing interest in cover crops that can support beneficial insects and pollinators. However, this requires letting appropriate cover crops go to flower, creating an additional challenge to the timing of 90 days between termination and cash crop planting in summer fallow regions. What are your thoughts on how to achieve improved support for beneficial control without jeopardizing crop insurance benefits?

A very difficult conundrum, since NRCS does offer increasing support for conservation practices that benefit pollinators. It seems that one may be able to obtain a "variance" from agricultural experts to undertake this "new technology" (see Topic 1 (2) above). If one is willing to utilize generally higher cost continuous cropping practice for summer fallow crops, the 90 day restriction is lowered to 35 days or earlier for late spring or fall seeded crops perhaps providing a greater window for allowing cover crops to mature to flowering. The additional benefits for cover crops for pollinators will generally require a change in rotation that will allow the cover crop to flower and still plant an insured crop. Cover crops for pollinators have a very limited scope.

Topic 5: Short season cover cropping practice and crop insurance

1. The crop insurance companies have been showing cover crop termination policy maps, however, they are unfamiliar with short term cover crops that are used in sugar beets. Can you please discuss short term cover crops? Two crop insurance companies' trainers at an agent training meeting could not provide information as to how a short term cover crop could be used in sugar beets.

As the national policy guidelines state:

Short Season Cover Crops – There are specific cropping situations where the producer will plant the intended crop, plus a short term seasonal cover crop (NRCS Conservation Practice Code 340 – Cover Crop) prior to or at the same time as planting the main or insured crop. In this case the seasonal cover emerges first and provides short term wind erosion protection until the main crop becomes established. Then cover crops are terminated by cultivation, frost /winterkill, or herbicides once the main crop is established. The seasonal covers used for the purpose of early crop establishment must be appropriate species for the area and the planned purpose.

This would seem to suggest that short term cover cropping in sugar beets will not negatively impact sugar beet insurance. Hopefully crop insurance agents in sugar beet growing areas will be receiving training on this specific topic.

Topic 6: Guidelines for cover crop termination on irrigated acres

1. Will there be guidelines for cover crop termination on irrigated acres?

At this time, termination guidance is not planned for irrigated acres since supplemental water is part of the system. The termination guidelines are based on soil moisture limits on yields of the insured crop. With irrigation the producer controls soil moisture.

2. The NRCS Cover Crop Termination Guidelines are strictly for non-irrigated crops, but the impact on Prevented Planting eligibility applies to both irrigated and non-irrigated crops with a cover crop planted, correct?

Yes

Topic 7: Haying and grazing of cover crops

1. If cover crops are planted in prevented plant areas, are there any date restrictions on haying or grazing the cover crop?

Once you receive a prevented planning payment you can plant a cover on the prevented planting acreage but you cannot hay or graze that cover crop before November 1, and cannot harvest it for grain or seed anytime.

2. After haying the cover crop in Zone 4, does the producer have to wait until sufficient re-growth has occurred before terminating the cover crop?

As the guidelines state:

In all areas, except for the RMA summer fallow practice in Zones 1, 2 and 3, cover crops may be grazed or harvested as hay or silage as long as the planned amount of biomass is available at the time of termination to meet the conservation purpose. For the RMA designated summer fallow practice, cover crops should not be hayed or grazed. A cover crop harvested for grain or seed will not be considered to have been planted for conservation purposes, and will be considered a "crop".

The producer will need to time grazing or harvesting of the cover crop forage dependent upon their method of termination and still meet the termination guidelines for the respective zone.

Topic 8: Past and future education and outreach on policy

1. What's the education/outreach plan to crop insurance agents from RMA? and NRCS?

NRCS provides communication down to their field offices on the cover crop termination guidelines. RMA provides information through Approved Insurance Providers (AIPs) and projects like those that developed this webinar.

2. What level of education to crop insurance agents about these termination guidelines has been done by RMA? or NRCS?

This webinar and some efforts through AIPs.

3. RMA's St. Paul region just released a nice fact sheet for IA/MN/WI (http://www.rma.usda.gov/fields/mn_rso/2014/covercrops.pdf). Are there/will there be fact sheets for other regions, like IL/IN/OH?

Yes

General comments:

1. We have advised our farmers to report their cover crops; for example in 2014 wheat seed use for cover. They have also certified this with the Farm Service Agency (FSA); there is no charge for reporting acreage as a cover crop. Since we have so much wheat for cover giving direction to the farmer regarding crop termination regarding wheat would be helpful.