



**Oral Remarks
By Ferd Hoefner
Farm Bill Implementation Listening Session
February 26, 2019**

Good morning! I am Ferd Hoefner, Senior Advisor to the National Sustainable Agriculture Coalition. I am addressing several crop insurance issues this morning. My colleagues Juli Obudzinski and Alyssa Charney will be addressing FSA credit issues and NRCS and FSA conservation issues, respectively, later today.

Let me start with the question posed by RMA on cover crops. We are quite pleased the new farm bill defines cover crop termination, and we believe the onus is now on the agency and the industry to use this definition and allow the Good Farming Practices process to make any future determinations that might be needed with respect to cover cropping. Farmers need flexibility in cover cropping, to respond to new research and to their own experience with best practices. We believe that the GFP process should now completely replace rigid termination rules.

In addition, we believe the time is now for RMA to amend its GFP and conservation practice guidance to provide that all NRCS conservation practices and enhancements are automatically recognized as GFP, without any caveats or qualifications. In our view, no farmer should be penalized or lose coverage under any crop insurance policy for using practices and enhancements that are approved by NRCS, period. We urge you to make this change immediately.

Second, with respect to your question on Whole Farm Revenue Protection, I would start by saying we are pleased the new farm bill establishes a stakeholder process to work on additional improvements to the policy. We very much want to be a part of that process. We also welcome the farm bill's list of potential areas for improvement.

We urge you to move quickly to set up the stakeholder process. We also urge you to move quickly on several of the changes so they are in place in time for the next crop insurance year. Those would include lifting the cap on livestock and nursery products, liberalizing the treatment of expanding operations, and counting government payments in the calculation of historic average revenue. In addition, we believe one sure way to reduce paperwork and reporting requirements would be to eliminate the collection and reporting of expense information. No other revenue policy requires expense information, and eliminating it for WFRP would greatly reduce the paperwork burden.

Third, with respect to your question on meeting the needs of specialty crop growers and the local food movement, it is our feeling that improvements and simplifications to WFRP is actually the most important step in this regard. But we are also aware that WFRP may not be the perfect policy with respect to Community Supported Agriculture farms. We would suggest that, in pursuing R&D on a Local Food Policy, as directed by the new farm bill, that focused attention be given to the unique insurance needs of CSAs.

Fourth, let me touch on NAP. While that is primarily Title I and FSA, there are portions related to NAP in the new farm bill in Title XI. Our number one suggestion on NAP implementation is for the program to recognize premium prices across the board and to accept a very wide range of data sets from which to calculate those premium prices. We would also recommend that NAP and WFRP training be part of the training process and outreach plans for the new state Beginning Farmer Coordinators stipulated by the new farm bill.

Section 11102 of the new farm bill requires FSA to share NAP data with RMA annually for its consideration. Section 11105 of the bill requires FCIC to use that NAP data to present to the Board R&D for a policy for a new commodity and for expansion of an existing policy to additional states and counties. We urge you to pursue this with vigor. We believe NAP can serve as a useful on-ramp to crop insurance, especially for beginning farmers or farmers making a transition in their farming operation. In particular, we encourage FSA and RMA to consider a NAP “whole farm” equivalent that could be used by beginning farmers as an on-ramp to Whole Farm Revenue Protection.

Finally, we strongly endorse the Conservation Data provision in the Miscellaneous Title of the new farm bill. Bringing conservation data to bear on insurance ratings and premiums is a critical test for the new FPAC mission area, linking as it does production and conservation. We encourage you to proceed rapidly to identify the relevant data sources and to then develop the required report with an eye toward maximizing data integration with the goal of bringing conservation and insurance policy into greater alignment.

Thank you for the opportunity to comment. We will be submitting more detailed recommendations in our written statement.