



Robert Johansson
Chief Economist
Office of the Chief Economist
United States Department of Agriculture
Stop 3810, Room 112-A
1400 Independence Ave., S.W.
Washington, DC 20250

October 8, 2015

Dear Dr. Johansson:

National Farmers Union (NFU) appreciates the opportunity to comment on the interagency report “Climate Change, Global Food Security, and the U.S. Food System” (the report). NFU has nearly 200,000 family farmer, rancher and fishermen members nationwide and organized divisions in 33 states. Our mission is “To advocate for the economic and social well-being, and quality of life of family farmers, ranchers, fishermen and consumers and their communities through education, cooperation and legislation. National Farmers Union advocates sustainable production of food, fiber, feed and fuel.”

NFU is very concerned with the ongoing and future impacts of climate change on agriculture and food security. The NFU Board of Directors recently voted to make the issue of climate change a top-tier priority for the organization. The precise effects of climate change endured do and will vary dramatically from producer to producer but invoke fundamental values shared by NFU members. NFU’s policy is set annually through a vigorously democratic process designed to ensure the policy is a true reflection of the consensus of the organization. NFU’s policy specifically addresses climate change, calling for more research to understand potential and realized impacts, carbon emission cap and trade programs, the creation of markets for carbon sequestered in agricultural lands, and international collaboration in emissions reductions.¹ More importantly, NFU’s policy embodies the organization’s present and historic principles, some of which are threatened by climate change. These principles include domestic and global food security and competitive markets.

NFU appreciates the contributors’ work on this report because the information found within will assist officials in making effective decisions on climate policy. NFU will utilize the report in our efforts informing and encouraging strong climate resiliency policies and educating our members, urging them

¹ “Policy of the National Farmers Union,” 2015. http://www.nfu.org/nfu-2015-policy/2066#_Toc416184537

to learn about what climate change means for their businesses and to engage in production and conservation practices that enhance climate resilience.

To complement the existing information in the report, NFU requests that the contributors note and explore, to the extent possible, consideration of food system consolidation and concentration among the many salient factors jeopardizing global food security already identified. We believe these trends are likely to be accelerated by climate change, and that global food security is more vulnerable to climate change-related disruption when it is over-reliant on heavily concentrated and consolidated food systems.

I. Family Agriculture's Investment In Food Security

NFU takes very seriously family agriculture's special responsibility to diligently pursue universal food security. We are committed to building climate resilience to ensure we can effectively manage this responsibility as well as for the well-being of family farmers and rural communities. Our policy states, "Everyone should have the right to have access to safe and nutritional food," and supports the maintenance and expansion of domestic nutrition assistance programs.² It also specifically calls for food and development aid for the poor abroad. Our policy is distinctive in that it also calls for spending foreign aid dollars on food produced in the same country where aid is targeted instead of U.S. produced food when possible and opposes dumping agricultural products in developing countries. These policy points demonstrate NFU's strong commitment to global food security. The organization is driven to increase climate resiliency because of these food security concerns.

Challenges related to climate change, such as the increased frequency of extreme weather events and changing access to water, will impair family farmers' ability to produce adequate food for the global population. The report's clear, well-explained account of the threats climate change pose to global food security will provide strong evidence of the need for climate resilience policy in discussions with political leaders and encouragement for NFU members considering implementing climate resilient measures on their operations.

II. Food System Consolidation And Climate Change

Competition is another important priority for NFU. In addition to the economic concerns related to competitive markets, competition is important to food security. NFU's policy points to increased

² *Id.*

horizontal and vertical integration and the declining number of family farms as indicators that the food and agriculture markets are becoming too consolidated. Mary Hendrickson, Department of Rural Sociology at the University of Missouri, wrote in an article published this summer, “As the negative impact of a changing climate on the agriculture and food system becomes clearer, as soil degradation continues to increase across the globe, and as the world’s population grows larger, there are a number of emerging risks in our dominant global food system.”³ The article notes that the dominant food system has grown more consolidated and concentrated over the last 150 years and explains how this has had a negative influence over the resilience of the dominant food system.⁴

Hendrickson’s observations point to an important problem NFU encourages the contributors to note and explore in the final report. Farmers, processors and shippers who continue operating as disruptions related to climate change increase will, in many cases, find adapting to climate change expensive. A recent U.S. Department of Agriculture (USDA) document found “Current climate change effects are challenging agricultural management and are likely to require major adjustments in production practices over the next 30 years.”⁵ Food system participants beyond the farm gate are likely to face similar adjustments, adjustments that will be costly to implement. The cost of these adjustments may accelerate ongoing food system consolidation and concentration by driving smaller farmers and processing and shipping businesses without the means to implement the adjustments out of business. At this point, the additional consolidation and concentration would make the dominant food system even less resilient.

NFU requests more research and focus on this potential link between climate resilience and food system concentration and consolidation. In particular, we are concerned that consolidation and concentration may impair communities’ ability to feed themselves as local production and processing is increasingly overtaken by interests of increasingly large scale, just as climate change worsens the vulnerability of the

³ Hendrickson MK (2015) Resilience in a concentrated and consolidated food system. *J Environ Stud Sci* 5:418-431. At 418.

⁴ *Id.* at 425-427.


⁵ Walthall, C.L., J. Hatfield, P. Backlund, L. Lengnick, E. Marshall, M. Walsh, S. Adkins, M. Aillery, E.A. Ainsworth, C. Ammann, C.J. Anderson, I. Bartomeus, L.H. Baumgard, F. Booker, B. Bradley, D.M. Blumenthal, J. Bunce, K. Burkey, S.M. Dabney, J.A. Delgado, J. Dukes, A. Funk, K. Garrett, M. Glenn, D.A. Grantz, D. Goodrich, S. Hu, R.C. Izaurralde, R.A.C. Jones, S-H. Kim, A.D.B. Leaky, K. Lewers, T.L. Mader, A. McClung, J. Morgan, D.J. Muth, M. Nearing, D.M. Oosterhuis, D. Ort, C. Parmesan, W.T. Pettigrew, W. Polley, R. Rader, C. Rice, M. Rivington, E. Roskopf, W.A. Salas, L.E. Sollenberger, R. Srygley, C. Stöckle, E.S. Takle, D. Timlin, J.W. White, R. Winfree, L. Wright-Morton, L.H. Ziska. 2012. *Climate Change and Agriculture in the United States: Effects and Adaptation*. USDA Technical Bulletin 1935. Washington, DC. 186 pages. At 119. http://www.usda.gov/oce/climate_change/effects_2012/CC%20and%20Agriculture%20Report%20%2802-04-2013%29b.pdf

transportation systems the dominant food system relies upon for food distribution. Increased reliance on food from distant sources may prove disastrous if extreme weather events cut off shipping routes.

III. Conclusion

NFU appreciates your work on the report and looks forward to the publishing of the final product. We anticipate that this report will be a valuable resource for our advocacy and education efforts. Thank you for your consideration of our comments. NFU stands ready to provide any further assistance that may be helpful to your efforts.

Sincerely,



Roger Johnson
President