

November 17, 2023

The Honorable Tom Vilsack  
Secretary of Agriculture  
1400 Independence Ave., SW  
Washington, DC 20250

Dear Secretary Vilsack:

Considering the overwhelming concerns we have heard from our producers across the country, the undersigned organizations urge USDA to revise the Emergency Relief Program (ERP) for 2022.

America's farmers and ranchers continue to endure extreme weather events, such as hurricanes, floods, multi-year droughts, freezes and record-high temperatures. Additionally, inflation and supply chain disruptions have led to a dramatic increase in input costs, with interest rates for many operating loans approaching 10 percent. These burdens not only impact the growers we represent, but entire rural communities.

We appreciate Congress and the Biden Administration continuing to recognize the important role agricultural producers play in feeding and clothing the world. Last December, Congress passed, and President Biden signed into law, appropriations legislation providing \$3.74 billion in much-needed ERP assistance to agricultural producers impacted by a wide range of natural disasters in 2022.

Yet, we are very concerned about two newly introduced ERP 2022 provisions outlined in program guidance released on October 27: (1) progressive payment factors used to prorate payments; and (2) the method used to incorporate producer-paid insurance premiums. Neither of these provisions were part of ERP 2020 or ERP 2022, and both appear inconsistent with the congressional intent of the enabling legislation.

Additionally, these two programmatic changes will penalize many producers throughout the country. In the case of the progressive payment factor, we oppose a policy that delivers the least amount of benefit to those who have lost the most outside of the payment limits provided in statute. While we appreciate the funding restraints under which ERP 2022 was developed, we believe that USDA should instead aim to provide more equitable support for losses of all magnitudes. This can be achieved by using a single, uniform factor, as USDA has done in the past. With regards to incorporating the producer-paid premiums, this change will keep some growers from qualifying for any assistance and create a significant disparity of payments among producers.

We are also concerned that Track 2 of ERP 2022 continues USDA's burdensome reliance on Schedule F or equivalent tax documents to determine potential assistance, even though these documents often do not provide a full picture of crop revenue or losses for producers who primarily use cash accounting methods, and the approach does not follow the statute in compensating for crop losses.

Although Phase I of ERP 2020 and ERP 2021 were not perfect, they were well received by farmers experiencing losses and provided a more equitable approach to assistance than ERP 2022. We urge USDA to alter the current program calculations in a manner that more fully meets the needs of all producers.

Thank you for your consideration of our request.

Sincerely,

American Cotton Producers  
American Farm Bureau Federation  
American Soybean Association  
American Sugarbeet Growers  
Cotton Warehouse Association of America  
National Alfalfa and Forage Alliance  
National Association of Wheat Growers  
National Corn Growers Association  
National Cotton Council  
National Cotton Ginners Association  
National Council of Farmer Cooperatives  
National Peach Council  
National Pecan Federation  
National Pecan Shellers Association  
National Sorghum Producers  
North American Blueberry Council  
U.S. Durum Growers Association  
U.S. Peanut Federation  
USA Farmers  
USA Rice

Alabama Farmers Federation  
Alabama Peanut Producers Association  
Alabama Soybean and Corn Association  
Agricultural Council of Arkansas  
Arizona Cotton Growers Association  
Arizona Farm Bureau  
Arizona Pecan Growers Association  
Arkansas Farm Bureau Federation  
Arkansas Rice  
Arkansas Soybean Association  
California Cotton Ginners and Growers Association  
Colorado Association of Wheat Growers  
Colorado Farm Bureau  
Corn Growers Association of North Carolina

Delta Council  
Florida Citrus Mutual  
Florida Farm Bureau Federation  
Florida Fruit and Vegetable Association  
Florida Peanut Producers Association  
Florida Rice Growers  
Georgia Blueberry Commission  
Georgia Cotton Commission  
Georgia Farm Bureau  
Georgia-Florida Soybean Association  
Georgia Fruit and Vegetable Growers Association  
Georgia Peach Council  
Georgia Peanut Commission  
Georgia Pecan Growers Association  
Georgia Watermelon Association  
Idaho Grain Producers Association  
Illinois Farm Bureau  
Illinois Soybean Association  
Indiana Corn Growers Association  
Indiana Farm Bureau  
Indiana Soybean Alliance  
Iowa Corn Growers Association  
Iowa Soybean Association  
Kansas Association of Wheat Growers  
Kansas Corn Growers Association  
Kansas Farm Bureau  
Kansas Soybean Association  
Kentucky Corn Growers Association  
Kentucky Small Grain Growers Association  
Kentucky Soybean Association  
Louisiana Cotton & Grain Association  
Louisiana Farm Bureau Federation  
Louisiana Rice Producers' Group  
Michigan Farm Bureau  
Michigan Soybean Association  
Mid-Atlantic Soybean Association  
Midwest Council on Agriculture  
Minnesota Association of Wheat Growers  
Minnesota Corn Growers Association  
Minnesota Farm Bureau Federation  
Minnesota Soybean Growers Association  
Mississippi Farm Bureau Federation  
Mississippi Peanut Producers Association

Mississippi Rice Council  
Mississippi Soybean Association  
Missouri Farm Bureau  
Missouri Rice Council  
Missouri Soybean Association  
Montana Farm Bureau Federation  
Montana Grain Growers Association  
Nebraska Farm Bureau Federation  
Nebraska Soybean Association  
Nebraska Wheat Growers Association  
New Mexico Farm & Livestock Bureau  
New Mexico Pecan Growers Association  
New York Corn & Soybean Growers Association  
New York Farm Bureau  
North Carolina Farm Bureau  
North Carolina Small Grain Growers Association  
North Carolina Soybean Producers Association  
North Dakota Corn Growers Association  
North Dakota Grain Growers Association  
North Dakota Soybean Growers Association  
Ohio Corn & Wheat Growers Association  
Ohio Soybean Association  
Oklahoma Cotton Council  
Oklahoma Farm Bureau  
Oklahoma Pecan Growers Association  
Oklahoma Soybean Association  
Oregon Farm Bureau  
Oregon Wheat Growers League  
Panhandle Peanut Growers Association  
Pennsylvania Farm Bureau  
Plains Cotton Growers, Inc.  
Rolling Plains Cotton Growers, Inc.  
San Joaquin Valley Quality Cotton Growers Association  
South Carolina Corn and Soybean Association  
South Carolina Farm Bureau Federation  
South Carolina Growers Association  
South Carolina Peach Council  
South Dakota Corn Growers Association  
South Dakota Farm Bureau Federation  
South Dakota Soybean Association  
South Texas Cotton & Grain Association  
Southeastern Pecan Growers Association  
Southern Cotton Growers

Southern Rolling Plains Cotton Growers Association  
Southwest Council of Agribusiness  
St Lawrence Cotton Growers  
Tennessee Corn Growers Association  
Tennessee Farm Bureau Federation  
Tennessee Soybean Association  
Texas Corn Producers Association  
Texas Cotton Ginners' Association  
Texas Farm Bureau  
Texas Pecan Growers Association  
Texas Rice Producers Legislative Group  
Texas Soybean Association  
Texas Wheat Producers Association  
Utah Farm Bureau Federation  
Virginia Cattlemen's Association  
Virginia Farm Bureau  
Virginia Soybean Association  
Washington Association of Wheat Growers  
Western Peanut Growers Association  
Wisconsin Corn Growers Association  
Wisconsin Soybean Association

CC:

The Honorable Martin Heinrich, Chairman, Senate Appropriations Subcommittee on  
Agriculture, Rural Development, Food and Drug Administration, and Related Agencies

The Honorable John Hoeven, Ranking Member, Senate Appropriations Subcommittee on  
Agriculture, Rural Development, Food and Drug Administration, and Related Agencies

The Honorable Andy Harris, Chairman, House Appropriations Subcommittee on Agriculture,  
Rural Development, Food and Drug Administration

The Honorable Sanford Bishop, Jr., Ranking Member, House Appropriations Subcommittee on  
Agriculture, Rural Development, Food and Drug Administration

The Honorable Debbie Stabenow, Chairwoman, Senate Committee on Agriculture, Nutrition,  
and Forestry

The Honorable John Boozman, Ranking Member, Senate Committee on Agriculture, Nutrition,  
and Forestry

The Honorable Glenn "GT" Thompson, Chairman, House Committee on Agriculture

The Honorable David Scott, Ranking Member, House Committee on Agriculture