March 18, 2025

William Hohenstein
Director of the Office of Energy and Environmental Policy
Office of Chief Economist
United States Department of Agriculture

Re: Request for Comments: Technical Guidelines for Climate-Smart Agriculture Crops Used as Biofuel Feedstock, Docket ID USDA-2024-0003

Mr. Hohenstein:

The National Pork Producers Council ("NPPC") submits the following comments regarding the interim rule on Technical Guidelines for Climate-Smart Agriculture ("CSA") Crops Used as Biofuel Feedstocks ("interim rule"). We respectfully request that USDA reconsider this rulemaking to ensure it is consistent with President Trump's executive orders and that it also recognizes the valuable role manure plays as a nutrient and vital part of agricultural production.

For decades, American pig farmers have fully embraced what it means to be environmentally responsible farmers and businesspeople. They aim to meet worldwide consumer demand for their products, while simultaneously protecting water, air and other environmental resources in their care. Over the past six decades, through a process of continuous improvement in manure management, animal health and nutrition, and widespread incorporation of sustainability practices, the U.S. pork industry has reduced its land use, reduced its water use, reduced its energy consumption and has decreased its carbon emissions.[1] Indeed, the average U.S. hog farm is a carbon sink removing more GHG emissions than it produces while still generating nutritious, delicious and affordable protein valued by consumers around the world.[2]

With that background in mind, NPPC greatly anticipated the release of the interim rule to fully understand how the hog and other livestock farmers would play a role in the production of CSA crops used as biofuel feedstocks. Needless to say, pig farmers are extremely disappointed to find absolutely no mention or role for hog or other livestock farmers in the interim rule. Instead, the interim rule limits its discussion to only a limited set of CSA practices deemed capable of reducing greenhouse gas ("GHG") emissions or sequestering carbon: reduced till and no-till, cover cropping, and nutrient management practices, such as the use of nitrification inhibitors. Shockingly, the interim rule completely ignored the fundamental role that manure plays as not only the original sustainable and organic renewable resource but also as a superior soil conditioner.

Not surprisingly, pork producers are very disappointed that the interim rule did not include the use of manure in the list of practices farmers across the country can use to reduce GHG emissions and sequester carbon. Manure is the original close-loop recycled nutrient and the preferred source of nutrients by countless farmers across the country. Instead of acknowledging the reality of widespread responsible manure use by farmers across the country to produce food, fiber and fuel, manure use was

[1] 2025 We Care Sustainability Report, National Pork Board, available at https://www.porkcdn.com/sites/porkcheckoff/assets/files/2025WeCareReportfinal_1740411321990.pdf
[2] Ibid at page 26.

sidelined in favor of the interest of environmental and animal rights extremists that seek to paint hard working American farmers who utilize manure as polluters who need not be tolerated.

The agronomically sound use of locally generated manure to produce crops (often on the same farm where the manure was produced) and applied in lieu of some portion of the commercial nitrogen fertilizer that the farmer would otherwise use directly reduces on net the carbon intensity ("CI") score of the feedstock being produced. As such, this practice must be included in the list of practices for which changes in CI scores are calculated. Not only does manure used in this way reduce the CI score, it is known to have numerous other environmental benefits that should be encouraged, including improved soil health, better nutrient cycling and the support of a more circular economy where so-called wastes are put to productive and efficiency increasing uses. Current scientific literature supports the following: 1) manure replacing ≤50% fertilizer maintained annual crop yield and its sustainability; 2) manure substitution increased the soil organic carbon storage; 3) manure substitution reduced GHG emissions; and 4) manure substitution reduced the crop carbon footprint due to the soil organic carbon increase.[3]

NPPC respectfully requests that USDA withdraw the interim rule to reanalyze and restart the process, ensuring that the final rule is both consistent with President Trump's executive orders and recognizes the important role that manure plays as a valuable domestically produced renewable source of crop nutrient.

America's pig farmers look forward to working with USDA and Secretary Rollins to ensure they share in the opportunity to expand America's energy economy and continue to lead the way in sustainable agricultural production while ensuring food remains safe, abundant and affordable.

Please do not hesitate to contact me if you would like to discuss these comments further.

Sincerely,

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[3] J. Niu, et al., Manure replacing synthetic fertilizer improves crop yield sustainability and reduces carbon footprint under winter wheat-summer maize cropping system, Journal of Environmental Management (May 2024), available at https://www.sciencedirect.com/science/article/abs/pii/S0301479724009228#:~:text=The%20life%20cycle%20assessment%20(LCA,relative%20to%20synthetic%20fertilizer%20alone.