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As the prices producers receive continue to decrease and be effected by our ability to export our products we must realize that the rest of the world is looking more at environmental aspects. Being able to reassure our customers that we are good environmental stewards needs to be continually reinforced. Much like the Presidential order for all governmental agency's to implement an environmental management system, one possible path would be to take a proactive approach to use this recognized EMS system in the new farm bill. USDA could partner with producers to implement AG EMS's, much like a CSP program, to overcome both the subsidy issues and help reassure our customers that we are indeed showing and documenting continued environmental improvements at the farm level.

This being said, we would like to answer your questions #1 through #5 with the following statements:

The Environmental Management System approach provides a standard environmental business model, based on ISO 14001 templates, that allows all U.S. agricultural producers to label their products, their brands if they wish, third party certified by a credible EMS audit system. Furthermore, the EMS approach provides profit and efficiency measures by which U.S. farmers can determine the benefits of good and superior environmental management.

The next generation of farmers needs a unifying set of environmental principals and measures by which they can present themselves as responsible to environmentalists, consumers and regulators. An EMS approach can reduce the conflict that has been eroding the publics' confidence in agriculture.

Concerns about environmental requirements and neighbor reactions limit the willingness of some to pursue farming and the willingness of others to expand farming operations to include other family members. The availability of a pro-active EMS based support program will help to reduce this barrier.

Support to producers for practicing and documenting good conservation and environmental management effectively and equitably distributes assistance to all producers regardless of the commodities they produce.

The EMS approach gives U.S. farm policy the ability to capitalize on farmers' inherent stewardship principals to meet policy and environmental goals. It also provides a method for documenting performance through a continuous improvement process.

The EMS approach to conservation and environmental goals is based on environmental accountability. In discussions with farmers at the Sacramento Farmer-to-Farmer Conference in June of 2005, farmers cited credibility as the single most important provision of the EMS tool. The standards and audits (both peer audits and third party certifications) are the EMS mechanisms of environmental accountability and farmer credibility. The mission of sustainable agriculture can be led by farmers through the EMS approach conservation.

The EMS approach, because it is voluntary, gives agri-business the means it needs to further financially invest in the environmental and production goals of the American farmer. Agri-business can invest by assisting in the production of commodity specific EMS templates, in producer training and maintenance of their EMSs, in third party certification programs, and production incentives for certified farms.

An EMS approach also provides the opportunity to have documented environmental performance recognized through market incentive -- linked to labeling or other performance verification procedures.

While we as producers feel we are good environmental stewards, we are very poor in telling this and have even less ability to document improvement. Through the use of AG EMS's we, USDA and U.S. Ag producers, could maximize U.S. competitiveness and help our ability to compete in the global market place, along with looking to the future by setting both conservation and environmental goals in the new farm bill and future farm bills.