

**RATIONALIZING OUR CONSERVATION INVESTMENT
AND CHARTING A WAY FORWARD ON GREEN PAYMENTS**

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I am very pleased to be at the Outlook Conference and to have this opportunity to present some ideas concerning the conservation title of the next farm bill on behalf of the Sustainable Agriculture Coalition (SAC). SAC is a nationwide alliance of grassroots farm, rural and conservation organizations with a common agenda of promoting federal policy reform to support the long-term economic, social and environmental sustainability of agriculture, natural resources and rural communities. The Coalition works across a broad spectrum of agricultural policy issues, but with respect to the conservation arena we have been closely associated in particular with the development of the Wetlands Reserve Program, Continuous Conservation Reserve Program, Environmental Quality Incentives Program, Conservation Security Program, and Partnerships and Cooperation Initiative, among others.

The Coalition is also a partner in the new Farm and Food Policy Project (FFPP), a collaborative of diverse organizations united by the common vision of a more sustainable food and agricultural system. Starting with the 2007 Farm Bill, the FFPP will work for policies to increase farming opportunities, reward environmental stewardship, promote new markets and rural entrepreneurship, and increase access to healthy food. The opportunity for food and nutrition, farm and rural development, and conservation and environment organizations to work together on a common farm bill platform is an exciting one. Expect to hear more about this in the coming months.

The 2002 Farm Bill made significant strides for farmland stewardship by increasing the funding level of conservation programs overall, moving toward greater balance between land retirement and land stewardship funding, and creating a new approach to comprehensive stewardship incentives for working lands in the form of the Conservation Security Program (CSP). Implementation and funding of the conservation title in the intervening years has had its ups and downs, but as we transition into the next farm bill cycle, conservation interests should feel generally positive about the progress we have made. In our view, the 2007 Farm Bill should continue to promote and reward stewardship of the land by placing a high priority on working lands and fostering a new generation of conservation-minded farmers and ranchers.

A Conservation Title Overlay

Conservation title discussions often jump right into the alphabet soup of specific programs that form the core of the conservation title. I would begin my comments today, however, by taking a step back and surveying the possibilities for using the conservation title of the next farm bill to create a stronger foundation for addressing critical agro-environmental issues in a more

comprehensive fashion. Attention often focuses heavily on specific programs, specific constituencies, and specific resource concerns without sufficient attention to the overall architecture of the conservation effort. In my view, this does our cause a disservice and results in sometimes disjointed policy outcomes. To correct this deficiency, we should use the coming farm bill reauthorization as an opportunity to establish some broader ground rules. I offer the following list of ideas as a way to start that conversation. The new conservation title could:

- establish a process for creating national natural resource and environmental objectives and anticipated outcomes for conservation program investments;
- enhance existing authority and add mandated funding for ongoing monitoring and evaluation of the outcomes of the conservation investment;
- reauthorize and revise the Soil and Water Resource Conservation Act of 1977;
- reinstitute an extension and educational assistance component to each program to enhance outreach and promote more creative uses of financial assistance dollars;
- establish agro-ecological sustainability as a central focus of the total federal agricultural conservation investment;
- set whole farm conservation planning at the heart and gateway to all financial assistance programs;
- provide a mechanism to begin handling new, emerging conservation priorities and resource concerns;
- promote in a very major way cooperative conservation targeted, partnership-based projects;
- create stronger authority for special incentives and outreach to achieve the dual goals of helping new farmers and ranchers get started in agriculture while encouraging them from the outset to develop and implement comprehensive stewardship plans;
- reaffirm the decision of the last farm bill to fund technical assistance for farm bill conservation programs from mandatory funds; and
- enhance the mission, use and authority of the State Technical Committees and Local Work Groups.

Each of these points is a major topic unto itself, but in short, summary fashion let me say a few words about each of these areas.

Natural Resource and Environmental Objectives: The farm bill could provide a mandate for USDA to identify and periodically revise national natural resource and environmental objectives and anticipated outcomes for the farm bill conservation programs as a whole. To the maximum extent possible, the objectives should be expressed in terms of specific and measurable improvements for each major conservation purpose and natural resource concern. The iterative process of developing and refining objectives should include specific indicators to track changes in the status and conditions of natural resources and environmental quality. These objectives and indicators should be coordinated closely with the monitoring and evaluation system and the National Conservation Program addressed below.

Monitoring and Evaluation: The farm bill could provide for comprehensive and integrated national and regional monitoring and evaluation program to assess progress in reaching natural resource and environmental objectives. While the last farm bill started down this road, at the very last moment of the conference committee on that bill, the proposed mandatory funding for

this effort was eliminated. In our view, mandatory funding is essential for a positive, lasting result. A monitoring and evaluation component should be a percentage of total spending for each farm bill conservation program, provided through the Commodity Credit Corporation in much the same manner as technical assistance funding is provided currently. Cooperative agreements or competitive grants should be provided for work by relevant federal and state agencies, universities and colleges, non-governmental organizations, producers, and other qualified individuals. The system should be coordinated directly with the RCA's National Conservation Plan, with regular appraisals and a strong feedback loop back to the resource and environmental objectives.

Resource Conservation Act: The Soil and Water Resource Conservation Act of 1977 requires USDA to periodically conduct comprehensive appraisals of soils, waters, and related resources within the scope of programs administered by the Department. These appraisals are then to be used to develop a National Conservation Program. The last national program required by current law would occur in 2007, which means the next farm bill would be an opportune time to extend and revise the Act. Such a move could be coordinated with the objective and indicators and monitoring and evaluation authorities proposed above, and could also be tied in closely to the current Conservation Effects Assessment Program (CEAP) effort, with both oriented to exploring alternative future-oriented approaches to conservation. This system could then help inform conservation title choices and agricultural appropriations choices moving forward.

Educational Assistance: The old Educational Assistance component of EQIP could be re-instituted, but extended to all conservation financial assistance programs. A specific percentage of total mandatory program dollars should be set aside for this purpose. This funding should be available to Extension, non-governmental and community-based organizations, educational institutions, conservation districts, and producers, and should be used to increase awareness of conservation program opportunities, enhance producer knowledge of conservation and environmental systems and practices, provide training and decision support aids for sustainable and organic farming system approaches to conservation, and help foster landscape level and watershed and regional cooperative ventures.

Sustainable Systems Approach: Current conservation program financial investments are often constrained by two related problems. At the farm level, program choices and program delivery often focus too much on a single resource or even a single practice. Moving from a practice approach to a systems approach -- long a hallmark of sustainable and organic agriculture -- is overdue. Adoption of a farming and conservation systems approach in the conservation arena would greatly improve the short and long-term value of the technical and financial investment. Beyond the farm level, a related problem has been the tendency to single out practice-based changes to improve conservation performance given an existing farming system and region, regardless of whether the cumulative impact of widespread adoption actually would solve major resource concerns and environmental problems or not. Assuming no changes in the underlying farming system is the wrong point of departure for technical and financial assistance programs if their aim is to actually solve resource concerns. The farm bill should require greater attention in each and every program to developing sustainable farming systems that solve macro-level agro-environmental problems.

Whole Farm Planning: Unfortunately, comprehensive conservation planning seems to be more and more divorced from financial assistance program delivery. The next farm bill should take steps to reverse that trend. Comprehensive conservation planning could be made the basic entry point for farmers and ranchers to access multiple conservation financial assistance programs. After assessing their resources, status, problems and potential solutions, farmers and ranchers can then be guided to apply for the appropriate incentive, cost-share, or easement programs that best meet their needs. As an incentive for superior stewardship planning, the farm bill should provide for automatic eligibility to the relevant financial assistance programs if the plan addresses all resource concerns and equals or exceeds sustainability or quality criteria. Rather than viewing whole farm total resource management planning as a luxury we cannot afford, it should be put back into the drivers seat and used to streamline our approach to conservation program eligibility.

Emerging Priorities: The next farm bill should articulate a clear process for establishing and addressing new resources of concern, including a timeline and a process for stakeholder involvement. While a great deal remains to be achieved in soil and water conservation and wildlife habitat, the federal conservation effort also needs to be capable of handling new, emerging conservation priorities, including plant and animal germplasm conservation, pollinator protection, invasive species management, and energy conservation. The conservation title should direct that a transparent process be established, one coordinated with the National Conservation Program and including adequate funding mechanisms.

Partnerships and Cooperation: Despite its strong and direct relevance to the President's "Cooperative Conservation" Executive Order, the Partnerships and Cooperation Initiative authorized by the 2002 Farm Bill has sadly not been implemented other than in a limited manner for planning grants under the Cooperative Conservation Partnership Initiative. The Partnership and Cooperation Initiative should be reauthorized and enhanced in the next farm bill. It should become a mandated initiative and continue to be funded through existing state allocations for the full range of farm bill conservation programs. A very significant amount of a state's allocation should be available for cooperative conservation projects, with wide flexibility to 'mix and match' program funding streams and mechanisms to tackle specific local problems. All cooperative projects should include multiple partners, strong conservation planning requirements, and detailed monitoring and evaluation plans. Special efforts should be made to include projects with beginning, limited resource, and tribal producers and to include projects that focus on making rural communities attractive places to live and visit by providing landscape and habitat amenities.

Beginning Farmers and Ranchers: Conservation programs can play an important role in assisting beginning farmer and ranchers. The 2002 Farm Bill included a provision authorizing special incentives for beginning farmers to help them adopt long term conservation plans from the outset, when conservation system changes are often easier to make and the public investment has a longer pay-off period and thus an improved cost-benefit ratio. The last bill also included a 15 percent cost-share rate differential or bonus for beginning farmers and ranchers. Implementation of the 2002 provision has been spotty and weak, but these provisions should be continued and considerably strengthened in the next round.

Technical Assistance Funding: The new farm bill should reaffirm the 2002 decision (re-iterated in 2004 legislation) to fund technical assistance for conservation financial assistance programs as a percentage of the total program funding stream, using CCC dollars.

State Technical Committees and Local Work Groups: State Technical Committees are the bridge between national and local efforts and the entity through which to reach consensus on implementation within states on priorities, funding allocations, special projects, and program implementation options. Unfortunately, State Technical Committee implementation at the state level is very uneven, running the full gamut from exceptional to nearly non-existent. The new farm bill should strengthen and clarify role of the STC, improve accountability procedures from the agency back to STC participants, and create incentives and penalties, respectively, for strong and weak state use of the STC to spur improved performance. Local work groups should be re-established as local subcommittees of the State Technical Committees and should be opened to the same categories of membership as the STCs.

Balance and Streamlining

The next farm bill also provides an opportunity to:

- continue movement toward improved balance between land retirement and stewardship incentives;
- renew our commitment to conservation compliance;
- make clearer choices and better balance between comprehensive base conservation programs and programs focused on specific places or resource problems; and
- move toward streamlining at least program delivery if not actual programs.

Retirement and Stewardship Incentive Programs: From 1985 through 2002, funding for land retirement made up the vast majority of farm bill conservation funding. Each of the past three farm bills have added land stewardship incentive dollars for working farmland to the mix, with the 2002 Act actually taking an enormous step toward reaching parity. If we choose to continue to make progress on creating a more balanced conservation portfolio, the next farm bill needs to redress the imbalance between financial assistance programs that promote land retirement and those programs emphasizing conservation management of land in agricultural production by further increasing funding for the latter. We think the movement to expanding total funding for conservation and, as part of that expansion, reaching and exceeding parity for working lands, should be a fundamental goal of the next farm bill. Our preferred choice to achieve that goal would be to substantially raise funding levels for the Conservation Security Program, but whatever path is chosen the next farm bill cycle should result in stewardship incentives for active management of conservation systems for agricultural production moving toward parity and then actually exceeding land and farm retirement funding.

Enhancing Compliance Features: The 2007 bill also provides an opportunity to reassess and improve the conservation compliance regime. The 2003 US Governmental Accountability Office investigation of compliance revealed a multitude of problems resulting in weakened enforcement. While much of the corrective actions that need to happen are at the administrative level, the next conservation title should also reinvigorate compliance by, for instance, narrowing

the existing waiver authority and strengthening waiver guidelines and accountability. In addition, the next conservation title should take new, affirmative steps to expand the reach of compliance. For instance, the new title could require compliance plans to reach or exceed the quality criteria for soil conservation. It could extend compliance to all cropland eroding at excessive levels. Sodbuster rules should be strengthened by prohibiting commodity, insurance, and conservation subsidies on any permanent grasslands and prairie without a cropping history if the land is cropped in the future. Swampbuster, sodbuster and compliance should also be re-linked to receipt of crop insurance subsidies.

These types of changes are significant from the standpoint of balancing, streamlining and funding since the higher the bar and greater the range of the basic requirements and protections, the less that needs to be covered by conservation incentives programs. This becomes a far more important factor in a period of fiscal restraint than it may have been in the last farm bill cycle.

Base and Targeted Programs: Another question looming for possible farm bill resolution is making clear, rationale choices as to which programs will be the base conservation programs – open to all, everywhere – to ensure sustainability of resource base, encourage widespread adoption of essential practices, and reward commitment to stewardship and planning, and which programs will be focused on specific places, specific resource problems, or specific types of farmers?

Producer interest and demand for existing program dollars far surpasses available funding. From the demand perspective, that is good news, but the supply constraint is cause for concern. Even if the next farm bill is successful in raising the total conservation program funding pool by the same absolute amount as the last bill, which with increased federal deficits is hardly a sure bet, we would still be faced with funding constraints relative both to demand and to environmental opportunity. Therefore, we should be as clear as possible in the next farm bill about program scope and objectives.

An example of the potential pitfalls from not choosing and defining carefully is provided by the last farm bill. A major push was made from some quarters to make the Environmental Quality Incentives Program less of a targeted program than it had been designed to be and more a base program available to all producers everywhere. While the statutory language itself was changed little, the Department nonetheless made major changes in EQIP implementation, eliminating nearly all traces of targeting from the rule. The result has been that a program originally designed as a targeted program is now trying to service as a base program. On the other hand, the Conservation Security Program, which was designed and passed as a comprehensive base program, has, in the implementation phase, been transformed into a rotating watershed program. With program design and program implementation at such an extreme mismatch, it is inevitable that delivery problems have emerged. Another example would be the Grasslands Reserve Program, where the small size of the program relative to the active grassland resource base would have suggested a very specially targeted program, the legislative language was left untargeted, and program implementation has tried with limited degrees of effectiveness to focus limited resources.

Streamlining: The question of streamlining is nothing if not thorny. Many would argue we already have too many farm bill conservation programs. Some argue this point from the standpoint of the farmer and the bewildering array of programs with separate rules, eligibility criteria, and enrollment schedules. The producer ultimately must integrate resource concerns and prescriptions for the farm or ranch, yet we have a tendency to deliver programs as separate fiefdoms. Others argue the streamlining point from the standpoint of sustaining a broad-based coalition capable of defending farm bill conservation spending over the long haul, annual appropriations bill by annual appropriations bill. If the community remains splintered by specialized program, the chances for a strong united front declines.

I tend to agree with this line of thinking. In my view, it would not be difficult in concept to trim the alphabet soup of programs down to just four or five, with a base program, broadly available, for working lands and a base program, broadly available, for targeted land retirement, preferably through long term easements, plus a second set of programs in each category that were specifically targeted to major resource problem areas and were thus not available nationwide. But the key word here is “in concept.” While I think this kind of streamlining is possible and advisable, I do not think it is highly likely. In fact, hardly a day goes by when I do not see a proposal come across my desk for adding still more programs to the farm bill conservation program mix, or for adding new subprograms within existing programs. It seems like every conceivable interest group with a particular priority resource concern or a particular priority farm type or a particular regional interest wants to be able to have their resource or their type of farming or their region with a program of its own to hang its hat on.

Given this reality, I would suggest a more modest goal of trying to keep the conservation title alphabet soup from becoming any more splintered than it already is, and then trying to coalesce around a streamlined delivery system. If we can at least start viewing conservation programs more as interdependent components of a mutually supportive portfolio we will have made some progress. Streamlined delivery should be as farmer friendly as possible, with program integration at the farm and ranch level. For instance, it should be within the ballpark of possibility to institute a unified sign up, application, and contract process. We could stipulate continuous sign-up procedures wherever appropriate, and off-season enrollment periods where continuous sign-up is not an option. We could create cross program eligibilities. We could provide incentives for collective action by producers. And as I noted earlier, at the very least, we should provide for a whole farm conservation planning entry point into all programs and should make a major commitment to cooperative conservation through a mandatory and robust Partnerships and Cooperation Initiative.

The Future of Green Payments and the Conservation Security Program

The current commodity program system encourages specialization, intensification, and overproduction while placing more diverse, extensive and resource-conserving systems at a competitive disadvantage. Commodity payments also distort land prices, increasing carrying costs for all farmers and making land rental and purchase more difficult for new farmers. In the absence of effective payment limitations or other more advanced targeting provisions, commodity programs also promote consolidation and concentration into fewer, larger, less diverse farming units.

At SAC, we believe the time has come to create an effective safety net for farmers that eliminates or at least greatly diminishes these negative effects of the current system that thwart widely supported goals of fostering family farms and environmental enhancement. In our view, one part of this new farm program arrangement will be a comprehensive ‘green payments’ stewardship incentives system that includes, at its heart, an expanded Conservation Security Program. Commodity program reform must help capture dollars needed to institute comprehensive conservation programs.

In light of continuing serious agro-environmental challenges, tight budgets, and evolving trade rules, consolidating and strengthening the CSP and integrating it more closely with both farm programs and the other conservation programs will be one of the most important challenges of the next farm bill.

The farm safety net should be made available to all types of farmers and farming systems while allowing market influences to encourage innovation and entrepreneurs in rural America. The CSP supports conservation farm operations of all types, all crops, and all enterprises. The Conservation Security Program is a natural resource outcome-based program that supports performance indicators rather than prescriptive activities and comprehensively addresses soil, water, wildlife and other resources of a healthy agricultural industry.

Some of the original, strongly backed attributes of the CSP legislative proposal incorporated into the last farm bill bear repeating as we head toward its reauthorization and improvement:

Developed by Farmers – the basic principles of the Conservation Security Program were developed by farmers in workshops and meetings across the country during a multiyear effort to solicit their views of key ingredients for a new farm bill stewardship incentives program.

Comprehensive, One Stop Shop Approach to Conservation – producers must integrate a wide variety of resource concerns on their operations, yet face a ‘balkanized’ set of programs, each with separate resource goals, rules, and eligibility requirements; CSP provides a comprehensive approach covering the full range of conservation and environmental issues related to working lands, and enables participation based on one unified, site-specific conservation plan.

Rebalancing – conservation funding has shifted toward land and farm retirement; CSP helps restore a better balance in support of incentives for working lands so that producers don’t have to stop farming in order to benefit.

All Farms/All Ranches/All Regions – CSP promotes participation in a comprehensive, voluntary conservation incentives program in all regions of the country, on all types of agricultural land, for all types of operations.

Complete Planting and Enterprise Flexibility – CSP crop and enterprise choices are based on the market, family goals, and conservation objectives, not prescription.

Rewards for Stewardship – CSP pays producers in recognition of the public natural resource and environmental benefits provided on working farms and ranches, including maintenance payments for active management of already adopted practices; the focus is on long-term benefits through conservation planning; there are no perverse incentives (common to other programs) to penalize good stewardship or reward only previous poor practice.

Focus on Solving Problems – CSP is the first broad-based federal farm conservation program in history that by statute requires participants to solve resource problems to the non-degradation or sustainable resource use level.

Focus on Management and Farming Systems – CSP emphasizes cost-effective management practices and alternative farming systems.

Annual Income Support – CSP incorporates, in addition to cost-share assistance, a substantial potential for income enhancement and does so on an ongoing basis, not as a one-shot deal for help installing a particular practice

Graduated Enrollment – CSP allows the producer to decide what level or tier to participate in; a basic set of conservation practices for some or all of an operation, a conservation system for the whole operation that includes some more far-reaching practices; or a whole farm, total resource management approach.

Fostering Innovation – CSP producers may elect to participate in on-farm research and demonstration of conservation innovations, pilot testing, or on-site monitoring and evaluation, making the conservation delivery system more of a participatory effort that encourages innovation and sharing farmer-to-farmer knowledge.

Improved Competitiveness – CSP helps level the playing field for US producers now that EC countries have instituted a variety of new stewardship incentive programs for their producers.

WTO Compatible – CSP payments are not based on type or volume of production or on prices, and instead are based on fulfillment of clearly defined conservation conditions and compensation for environmental performance, making them “green box” payments in world trade parlance.

Complements Existing Programs – CSP can work in tandem with partial field land retirement programs like CCRP and WRP and contains specific rules for dual or merged participation for those already enrolled in other working lands conservation programs.

Whither CSP in the Next Farm Bill?: Much has been said in recent months about the placement and role of the CSP or its successor in the next farm bill. At the extremes of this emerging debate are sides that say CSP should only continue if it is jettisoned from the conservation title and made part and parcel of the commodity title of the farm bill or that say CSP should in no way, shape or form be viewed as an even partial replacement for commodity programs and is acceptable only as an “add-on” in the conservation title. We at SAC reject both of these extremes and encourage a more moderate approach. On the one hand, we firmly believe the CSP or its successor should be part of the conservation title, and should be transitioned in the

next farm bill cycle to becoming the comprehensive base program for working land conservation. On the other hand, we also firmly believe that resources need to be freed up from the commodity program title to help make the CSP vision a reality. We also believe that a variety of creative crosswalks are possible between commodity program reform and CSP enhancement that will help resolve some basic farm bill problem areas, helping to reach compromises that will aid in passing the next omnibus bill.

The CSP has faced considerable implementation and funding problems since its passage in 2002. The new farm bill and the rules and regulations that implement it should include provisions that will:

- Again give the program a nationwide entitlement status, making it available to eligible farmers for the 2007 farm bill cycle and beyond.
- Increase number of resource concerns to be addressed for Tier 1 and Tier 2 from one to two and three respectively.
- Prohibit continuation of a watershed rotation scheme, or at the very least condense it into a not greater than every three year rotation.
- Remove minimum tier eligibility criteria that require full achievement of resource management system quality criteria prior to participation in the program.
- Remove restrictions on eligible resource concerns and eligible practices.
- Replace base (“stewardship”) payments with a graduated conservation planning payment.
- Re-affirm and strengthen the commitment to provide substantial support for resource-conserving crop rotations through major enhancement payments.
- Require the use a soil quality analysis model that levels the playing field for all agricultural systems and is geared to actual soil quality measurement.
- Establish a clear interface between certified organic farming plans under USDA’s National Organic Program and CSP plans that allows for coordinated and farmer-friendly participation in NOP and CSP.
- Require continuous sign-up procedures.
- Prohibit declining variable enhancement payments.
- Strengthen the language providing for contract renewals.
- Strengthen the payment limitation language to remove any possibility of loopholes.
- Expand public input from stakeholders, including through STCs.
- Reduce arbitrary disparities in program rules and payment levels between watersheds within and between states.

Special Note on Trade Rules: Trade rules increasingly factor into decisions about domestic subsidies and agro-environmental programs are no exception. Current world trade “green box” rules for agro-environmental programs are based on programs that are now decades old and for the most part no longer in existence. The rules badly need to be modernized or they will foreclose many of the most important farm bill conservation program innovations.

Traditional cost share programs reward bad actors rather than good actors. Traditional cost share also does not work well for today’s conservation and environmental management challenges – it worked when main objective was to enhance productivity of farms and ranches, but not for

model in which environmental benefits created by producers primarily benefit taxpayer. For some time now the new emphasis has been on developing programs that pay for environmental services, but the current green box language is arguably too restrictive to cover these important new developments.

We are particularly concerned about the interplay between the green box criteria and the Conservation Security Program (CSP), Continuous Conservation Reserve Program (CCRP), Conservation Reserve Enhancement Program (CREP), Environmental Quality Incentives Program (EQIP), and the Partnerships and Cooperation Initiative, all of which contain features that are not necessarily justified by the current green box criteria of cost-share payments or payments for loss of income.

Incentives, enhancements, and bonuses in these programs recognize that farmers and ranchers may incur income losses when they modify their operations to provide the public with conservation and environmental benefits. Some changes to their operations, for example incorporating integrated pest management techniques, establishing intensively-managed rotational grazing systems, or switching to organic production systems, may increase the operation's profitability in the long-run but the farmer or rancher may incur short-term income losses during the transition period. Incentives, enhancements, and bonuses also reflect opportunity costs and the importance of environmental enhancement to society at large.

As Doha Round negotiations continue, we believe the US should forge an agreement that effectively modifies green box language to ensure that sound and effective US federal environmental and conservation programs are adequately protected by Annex 2 of the Agreement on Agriculture. The language should incorporate purposes in addition to extra costs or loss of income, including incentives needed to encourage compliance with or participation in government programs and remuneration for the provision of environmental services, provided of course that they are not related to or based on the type or volume of production or prices applying to any production.

In our view, retention and modernization of paragraph 12 language is not only a worthy goal in light of the conservation and quality of life benefits that can be obtained from the resulting green box-compliant programs, but also is absolutely central to being able to meet other goals of the Framework for Establishing Modalities in Agriculture. Establishing a “fair and market-oriented trading system through a programme of fundamental reform” and achieving “substantial reductions in trade-distorting domestic support” will be exceedingly difficult if green box-compliant alternatives to current trade-distorting support are not available in the US and elsewhere, or, if available are nonetheless open to repeated challenges.

Conclusion

I was asked by the people who put this panel together to address both the possibilities and probabilities for the next conservation title. I do believe that it is quite possible the next conservation title will include an increase in the alphabet soup of conservation programs and an escalation of earmarking within programs. I do think it quite possible we will once again shortchange conservation research, technical assistance, monitoring and evaluation, and

educational assistance. I do think it's possible the next bill will not make strides to increase working land stewardship incentives. I do think it is possible that the next conservation title will not make any significant strides toward supporting limited resource and beginning farmers. And I do think it's possible we will not do what is necessary to fulfill the vision of the Conservation Security Program as a full-scale green payments program that provides our farmers with our own equivalent to programs already being implemented by our European counterparts. But if we allow any of these things to happen, we will have missed out on a huge opportunity to improve the quality of life for farmers and farming communities, improve the environment, and improve the delivery and effectiveness of federal conservation dollars. We should not allow that to happen. Too much is at stake.