



March 1, 2019

Submitted Electronically

Department of Agriculture
Farm Service Agency
Natural Resources Conservation Service
Risk Management Agency
2018 Farm Bill Implementation Listening Session
Federal Register Vol. 84, No. 31, Pg. 4041, Thursday, February 14, 2019

Re: Comments for Docket Number USDA-2019-0001

North Dakota Farmers Union (NDFU) appreciates the opportunity to comment in Docket Number USDA-2019-0001 regarding the implementation of the Agriculture Improvement Act of 2018 (2018 Farm Bill). NDFU, the largest general farm organization in North Dakota, represents more than 50,000 farm and ranch families and their energy and agriculture supply cooperatives. NDFU's member developed policy positions have long advocated for reforms to crop insurance and the management of the crop insurance program.

Regarding Sec. 11107, Cover Crops, of the 2018 Farm Bill, NDFU requests the Risk Management Agency (RMA) revise crop insurance by exempting saline acres from crop insurance coverage at acreage reporting time. The exemption would permit producers to do a "conservation planting" of salt tolerant crops, such as barley, sunflower, oats, rye or others to be utilized as a remediation crop. Currently, a producer planting a salt tolerant crop on saline and non-saline soils, must carry crop insurance on every acre of the crop. The exemption is necessary because even though salt tolerant crops can produce well in saline soils, there may still be yield losses on the saline acres which would reduce the producer's actual production history (APH). By exempting the saline acres from crop insurance coverage, producers can rebuild soil health without negatively impacting their APH.

In addition to the exemption for saline acres, NDFU supports modification of the RMA's crop insurance rules so producers are not disqualified from crop insurance if a cover crop is seeded before physiological maturity and so producers can obtain insurance for specific cash crops when the crop is planted into living cover crops.

Regarding Sec. 11118, Program Administration, of the 2018 Farm Bill, NDFU requests the RMA further reform crop insurance to protect producers against quality losses, including protein discounts and yield reductions, and to make coverages available up to the cost of production. If



Comments of North Dakota Farmers Union

Docket Number USDA-2019-0001

March 1, 2019

Page 2

a producer has high yields, but files a claim for income loss due to disease or other quality discounts, the RMA should not lower the producers yield to justify the payment. By lowering the yield, the RMA is reducing the producer's APH which negatively impacts future crop insurance coverage. It is imperative that the effects of quality losses and multi-year claims on production histories be minimized so producers do not have diminished crop insurance coverage. If a producer files a crop insurance claim because of disease or quality loss, yields must not be lowered or if lowered, the lower yield must not be included in the producers APH.

NDFU respectfully requests the USDA implement the above changes to the crop insurance program and the RMA's management of the crop insurance program to better serve producers.

Sincerely,

NORTH DAKOTA FARMERS UNION

A handwritten signature in black ink that reads "Mark Watne".

Mark Watne
President