

United States Senate

WASHINGTON, DC 20510

August 23, 2022

The Honorable Tom Vilsack
Secretary
United States Department of Agriculture
1400 Independence Avenue SW
Washington, D.C. 20250

Dear Secretary Vilsack,

We are writing to express concern and request information regarding the administration's Methane Emissions Reduction Action Plan for livestock emissions. We are concerned that relying heavily on increasing the number of methane digesters will not sufficiently reduce methane emissions from agriculture and will have unintended negative consequences for agriculture industry consolidation and for environmental justice.

To our knowledge, USDA has not yet produced evidence that subsidizing manure digesters will reduce absolute emissions from the agriculture sector, which is the top source of U.S. methane emissions. Additionally, we remain concerned that USDA has not fully explored or produced evidence of the impacts of manure methane digesters on other key issues. These issues include co-pollutants of Concentrated Animal Feeding Operations (CAFOs), food system concentration, public health, and heightened community risks for rural, low-income, agricultural-dependent, and Black and Brown communities.

Despite this, USDA appears poised to invest significant resources in the rapid proliferation of methane digesters through the Environmental Quality Incentives Program (EQIP), Rural Energy for America Program (REAP), and AgSTAR. USDA has also included additional potential funding for methane digesters in its Climate-Smart Agriculture and Forestry Strategy.

Proliferation of methane digesters contributes to increased consolidation in the agrifood system. As consolidation and corporate power continue to shape the U.S. agrifood system, biogas is yet another global market that multinational agricultural and fossil fuel corporations are entering to further increase their economic power. To do so, companies could influence farmers, particularly hog and dairy, to increase farm herd size specifically for the concentrated manure — not more meat or milk. As one CAFO operator recently noted, “We used to joke about how funny it would be if we could make more money off the poop than the milk, and now we’re essentially here.” While more research is needed, [evidence](#) from California shows how the largest CAFOs are benefitting—and many are expanding herd sizes.

Methane digesters are expensive and would not be economically viable without significant public subsidies and incentives. A single manure digester system [costs anywhere between \\$400,000 and \\$5 million](#). Every taxpayer dollar spent subsidizing methane digesters is a dollar that cannot be spent on alternative manure management strategies or regenerative agriculture practices. If digesters are prioritized, farmers using regenerative management practices would be further undercut by multinational dairy and hog firms benefiting from public subsidies for methane digesters and the growing market for biogas. This is especially troublesome since USDA's commitment to invest in small and mid-sized producers through its Food System Transformation framework may very well be nullified by the agency's dedication to methane digesters.

United States Senate

Methane digesters also [leave behind vast amounts of greenhouse gases \(GHGs\) and pollutants](#). The main greenhouse gasses emitted in the processing of biogas are carbon dioxide and nitrous oxide; nitrous oxide being a much more potent greenhouse gas than methane. Further, liquid manure handling and biogas processing emits more ammonia than dry manure, which is known to cause respiratory issues and premature death, in addition to leaching into waterways. This raises significant environmental justice concerns for the rural, low-income, agricultural-dependent, and Black and Brown communities that will be directly impacted by construction of new digesters, pipelines, and biogas processing facilities.

Given these issues, we have a number of questions about methane digester efficacy as a tool to curb climate change. We believe it would be irresponsible to invest public resources into methane digesters without fully evaluating the overall impact of this strategy. To address these key concerns, we ask that USDA respond to the following questions.

1. What is the projected impact of providing additional subsidies for methane digesters on absolute greenhouse gas emissions from the agriculture sector? Will benefits from these subsidies accrue only to farmers or will they also subsidize agribusiness and fossil fuel corporations?
2. Will public investment in methane digesters accelerate dairy and hog sector concentration and consolidation, and incentivize increased herd sizes? Have you incorporated these impacts into your GHG reduction models?
3. What is the environmental justice impact of manure digesters and how does that align with this administration's commitment to environmental justice and racial equity? Please provide the details of the input that USDA has sought and received from communities living near methane digesters, CAFOs, and potential areas for new pipeline construction.
4. What is the opportunity cost of investing in methane digesters compared to regenerative agriculture practices and or alternative electricity production systems like wind and solar?
5. What best practices, monitoring, and reporting requirements are in place for recipients of federal manure digester funding (e.g. employing nitrification-denitrification systems, monitoring and reporting of leakage and discharges of co-pollutants, best practices for applying digestate, etc.)?

We appreciate your swift and dedicated efforts to address these concerns, and look forward to your response.

Sincerely,



Cory A. Booker
United States Senator



Kirsten Gillibrand
United States Senator

United States Senate

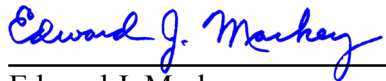
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