



March 5, 2021

The Honorable David Scott  
Chairman  
Committee on Agriculture  
U.S. House of Representatives  
1301 Longworth House Office Building  
Washington, DC 20515

Representative Pramila Jayapal  
U.S. House of Representatives  
1510 Longworth House Office Building  
Washington, DC 20515

Dear Chairman David Scott and Representative Pramila Jayapal,

On behalf of the Center for Biological Diversity and our 1.7 million members and supporters, we ask the House Agriculture Committee to fully examine the evidence on sustainable food systems and include scientists, environmentalists, biologists, and researchers at climate and agriculture meetings. At a recent House Agriculture Committee meeting on climate change, Chairman Scott shared a clip from the film, *Kiss the Ground*, that was recommended by Representative Jayapal. *Kiss the Ground* vastly overstates the ability of animal agriculture to repair damaging production practices and fails to address the need to change what we grow, not just how we grow it. While we appreciate your recognition that food policy is climate policy, regenerative animal agriculture falls dangerously short of climate mitigation claims. While an improvement on factory farming, it has the potential to distract from real climate solutions.

In 2019, a special report from the Intergovernmental Panel on Climate Change made it clear we cannot meet climate goals without reducing animal agriculture.<sup>1</sup> U.S. beef production produces 337 billion pounds of carbon dioxide equivalent annually (the same as 32.3 million cars).<sup>2</sup> To meet climate goals, the U.S. needs to reduce its beef production by 90%.<sup>3</sup> A grass-fed system, which currently makes up 2% of beef production, could only meet 27% of U.S. demand on existing pastureland.<sup>4</sup>

It is also important to consider the catastrophic impacts of the massive land, water, and pesticides it takes to raise livestock and produce feed crops to feed cattle. Animal feed is grown on 149 million acres of U.S. cropland, which amounts to almost half of the landmass of the lower 48 states.<sup>5</sup> Water for beef production is draining Western rivers, threatening entire ecosystems, and endangering numerous species of fish.<sup>6</sup> The U.S. does not have the land or water to dramatically scale up pasture-raised beef production, and attempting to do would be devastating for wildlife. This vital information is not highlighted in the film, which rests upon largely debunked theories of Allan Savory.<sup>7</sup>

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<sup>1</sup> Intergovernmental Panel on Climate Change, *Special Report: Summary for Policymakers* (2019), available at <https://www.ipcc.ch/srccl/chapter/chapter-5/5-5-mitigation-options-challenges-and-opportunities/5-5-2-demand-side-mitigation-options/5-5-2-1-mitigation-potential-of-different-diets/figure-5-12/>.

<sup>2</sup> Based on U.S. Department of Agriculture data showing the average U.S. per capita consumption of 156 burgers/year, multiplied by 320 million Americans. CO<sub>2</sub>e calculated using global warming potentials (GWP) (i.e. warming effect relative to CO<sub>2</sub> over 100-year period): N<sub>2</sub>O GWP=298, CH<sub>4</sub> GWP=25, hydrofluorocarbons GWP=1,430).

<sup>3</sup> Springmann, M. et al., *Options for keeping the food system within environmental limits*, NATURE (2018), available at <https://www.nature.com/articles/s41586-018-0594-0>.

<sup>4</sup> Hayek, M. and Garrett, Rachael D., *Nationwide shift to grass-fed beef requires larger cattle population*, 13 ENVIRONMENTAL RESEARCH LETTERS 084005 (2018), available at <https://iopscience.iop.org/article/10.1088/1748-9326/aad401>.

<sup>5</sup> Vesterby, Marlow and Krupa, Kenneth S., MAJOR USES OF LAND IN THE UNITED STATES, U.S. DEP'T OF AGRIC. ECON. RES. SERVICE (2001), [https://www.ers.usda.gov/webdocs/publications/47144/13203\\_sb973\\_1\\_.pdf?v=7647.8](https://www.ers.usda.gov/webdocs/publications/47144/13203_sb973_1_.pdf?v=7647.8).

<sup>6</sup> Richter, B., *Water Scarcity and Fish Imperilment Driven by Beef Production*, NATURE SUSTAINABILITY (2020), available at <https://www.nature.com/articles/s41893-020-0483-z>.

<sup>7</sup> See *Holistic Management: Misinformation on the Science of Grazed Ecosystems*, INT'L J. OF BIODIVERSITY (2014), available at <https://www.hindawi.com/journals/ijbd/2014/163431/>; see also *Eat more meat and save the world: the latest implausible farming miracle*. Allan



We need to shift toward better production practices for livestock, but we also need to be aware of the following limitations of livestock production as a solution to our environmental crises:

- There is insufficient scientific evidence that carbon sequestration through livestock grazing can offset cattle emissions, work long-term, or is feasible outside limited regional conditions.
- Longer grazing times needed for cattle to reach slaughter-weight under grass-fed systems results in more methane, largely from manure and enteric fermentation.<sup>8</sup>
- The biodiversity crisis is a serious a threat to food security and human health on par with the climate crisis, but this is often left out of the conversation, despite the extensive documentation of habitat destruction and harm to vulnerable wild species caused by livestock grazing.
- Crop diversity is often used as an indicator of biodiversity without evidence that those crops are promoting native plant and animal life. Rather the opposite can be true.<sup>9</sup>
- Regenerative grazing and grass-fed beef require more land than is available in the U.S. We need to address the reality that even the best practices are not scalable to meet current demand.
- There is no independent, standardized, or regulated definition for “regenerative agriculture” (or a metric to measure biodiversity impacts), allowing producers to apply the term to practices that are undermining the goals of reduced emissions, healthy soils, and improved biodiversity.

We must frame policy discussions around the need to substantially scale down beef production. We cannot continue to produce factory-farmed beef at the current rate, but neither can we afford to scale up grass-fed systems without dire consequences for the climate, wildlife, and the American landscape. The solution is a just transition toward a more sustainable food system. Currently, the U.S. overproduces meat and dairy but does not produce enough fruits and vegetables to meet daily servings recommended in the U.S. Dietary Guidelines. By shifting subsidies from the overproduction of meat to support for American farmers growing healthy, sustainable crops, the House Agriculture Committee can help struggling farmers while aligning aid with federal goals for public health and nutrition.

Policymakers must promote science-driven policy. Scaling up beef production, even with modified practices, does not match science-based recommendations for climate mitigation. These modified practices and any potential savings can only work by scaling *down* overall beef production. We are available to provide additional resources, information, testimony or answer any questions.

Thank you for your consideration,

Jennifer Molidor, Ph.D.  
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*Savory tells us that increasing livestock can reduce desertification and reverse climate change – but where is the scientific evidence?*, THE GUARDIAN (2014),

<https://www.theguardian.com/environment/georgemonbiot/2014/aug/04/eat-more-meat-and-save-the-world-the-latest-implausible-farming-miracle>; *Allan Savory's Holistic Management Theory Falls Short on Science*, SIERRA CLUB (2017) <https://www.sierraclub.org/sierra/2017-2-march-april/feature/allan-savory-says-more-cows-land-will-reverse-climate-change>.

<sup>8</sup> Hayek, M. and Garrett, Rachael D., *Nationwide shift to grass-fed beef requires larger cattle population*, 13 ENVIRONMENTAL RESEARCH LETTERS 084005 (2018), available at <https://iopscience.iop.org/article/10.1088/1748-9326/aad401>.

<sup>9</sup> Moss, C. et al., *The effects of crop diversity and crop type on biological diversity in agricultural landscapes: a systemic review protocol*, WELLCOME OPEN RES. (2020), available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7241271/pdf/wellcomeopenres-4-17720.pdf>.

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