The Role of Crop Protection Tools & Impact on Farm Bill Programs

Executive Summary

Introduction

The objective of the following analysis is to consider the impact on the Farm Bill's risk management, conservation, and nutrition programs under a scenario where access to crop protection products would be significantly restricted or lost. Specifically, state-by-state actions on product labeling that differ from the established regulation by the Environmental Protection Agency (EPA) and ongoing court battles that could impact the future availability of crop protection tools, including glyphosate.

Background

In July 2023, Aimpoint Research produced the report ***A Future Without Glyphosate***. The report concluded,

> *… if glyphosate were no longer available markets would adapt through substitution and adjusted practices,* ***but at a substantial cost to farmers and the environment****. U.S. farmers would bear the burden of increased input and operating costs with small farmers disproportionately affected. Further analysis reveals a cascading chain of likely higher-order effects and unintended consequences, the most impactful being the rapid release of additional greenhouse gases and the reversal of decades of conservation and sustainability gains****. The loss of glyphosate would not be trivial.***

Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the EPA regulates pesticides, including how and when they can be used, and provides detailed information on the pesticide label. Unlike virtually all other types of product labels, pesticide labels are legally enforceable. As the EPA notes, "… the label is the law.

Ultimately, allowing states to contradict EPA's scientific findings risks creating a ***complex, inconsistent, and potentially unworkable collage of pesticide label rules***, resulting in a patchwork of labeling requirements that would ***quickly disrupt commerce from availability, upstream in the supply chain, to distribution and manufacturing – leading many to question, what a world without herbicide would look like for farmers and the federal Farm Bill***.

Implications for the Farm Bill

A lack of legislative certainty in pesticide labeling poses several adverse consequences for the Farm Bill's commodity, conservation, crop insurance, and nutrition programs. Consider the following:

- Of the nine program crops corn, soybeans, wheat, rice, peanuts, sorghum, oats, and barley the added crop protection costs from a loss of glyphosate would total $2.89 billion in lost net farm revenue based on 2024 cost estimates from USDA.
- Cumulatively, for the six crops – corn, soybeans, cotton, wheat, canola, and sugar beets – as well as fallow land, reverting to conventional tillage for weed control would add $2.414 billion in costs, more than doubling the costs from glyphosate-enabled practices.
- Increasing the number of passes a farmer needs to take across their field from two under no-till methods to a maximum of eight for conventional tillage on a 500-acre farm would result in $3,772 in added hired labor costs ($7.54 per acre) and $7,326 in farm management opportunity costs ($14.65 per acre).
- The Title I Farm Bill safety net provisions do not provide relief for rising input costs, however, and thus a lack of crop protection tools would undermine the effectiveness these programs.

The long-term trend in Title II conservation programs is toward working land programs, however, a patchwork of state labeling regulations would threaten that, potentially leading to more idled U.S. farmland.

- The Farm Bill’s $632 million investment in cover cropping through EQIP and CSP would be undermined.
- Gains in carbon capture, sediment loss, nitrogen loss, and phosphorus loss would be negated.

Title IV nutrition programs could see higher costs from commodity price cost-push inflationary pressures.

- Over the life of the 2025 to 2029 Farm Bill, the total cost of a one percent increase in food inflation would add $5.3 billion to the cost of SNAP.
- Over the life of the 2025 to 2029 Farm Bill, 1.9 percent in cost of commodity procurement cost could add more than $1.8 billion to the cost of childhood nutrition programs annually.

Combined, the cost of nutrition program outlays could increase by $7.1 billion over the life of a 2025 to 2029 Farm Bill. Crop insurance under Title XI would face administrative burdens and higher payouts.

- Any loss of crop protection tools would require the federal crop insurance program’s Good Farming Practices (GFPs) to be adjusted accordingly, adding confusion and complexity to crop insurance decisions and coverage.
- Were GFPs to be adjusted, there is a considerable risk of additional losses and a corresponding increase in indemnities paid out under the crop insurance program, raising its costs.
- Such a situation would also lead to a lower actual production history (APH) for affected farmers with APH crop insurance policies.
- Fields with consistent use of cover crops conservation tillage, and no-till practices enabled by herbicides, particularly glyphosate, were 24 percent less likely than conventional fields to be declared “prevent plant” for insurance payments. The impact of these practices was an estimated savings of $2.946 billion to the federal crop insurance program, from 2019 to 2023, and a savings of $1.04 billion in 2019 alone.

The Agricultural Labeling Uniformity Act would reassert that the EPA is the preeminent authority on pesticide labeling and prevent states from imposing any labeling or packaging requirements that differ from, or are in addition to, those approved by the EPA in accordance with its scientific findings. This legislation could help address many of the threats to farmers and key provisions of the Farm Bill.