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General Comment

Thanks for the opportunity to comment on the proposed reporting framework for the Advancing Markets for Producers initiative. As a recipient that transitioned from the Partnership for Climate-Smart Commodities (PCSC) to AMP, we offer the following observations to help USDA develop a reporting structure that is practical, proportionate, and aligned with how projects are actually operating.

Reporting clarity remains a pressing concern: The Detailed Project Reporting (DPR) workbook has not yet been finalized, yet some awardees are already expected to submit reports against it. USDA should clearly distinguish which data elements are required versus optional before any reporting deadlines are enforced, and should communicate those distinctions consistently across USDA, NRCS, and NPO contacts.

Reporting requirements no longer reflect program realities: The restructuring required during the PCSC-to-AMP transition eliminated many partners whose primary function was MMRV and data collection. For many recipients, AMP implementation now resembles a market-based incentive or conditional cash transfer model more than a conservation practice program. Accordingly, GHG accounting requirements including emissions reductions, offsets, and insets, are no longer proportionate for projects that no longer have the technical capacity or program structure to support them. These requirements should be minimized or eliminated for projects where those functions were discontinued.

The DPR workbook is duplicative and burdensome: Multiple tabs requiring repeated entry of producer, farm, and field-level data significantly inflate reporting time, particularly for projects managing large numbers of small producers with limited recordkeeping capacity. Consolidating redundant fields and developing a centralized reporting platform, could substantially reduce burden while improving data consistency.

A tiered, prioritized reporting framework would serve both USDA and recipients better. We recommend USDA focus on a core set of high-value data elements (producer participation, financial assistance delivered, market-related outcomes, and basic implementation metrics) and reduce or eliminate reporting requirements that no longer align with the current direction of AMP.

In summary, simplifying the DPR, clarifying required versus optional elements, reducing GHG-related reporting where capacity no longer exists, and improving cross-agency communication would meaningfully reduce administrative burden, improve data quality, and strengthen the working relationship between USDA and its AMP awardees.