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March 4, 2022

The Honorable Dr. Homer Wilkes
Under Secretary
Natural Resources and Environment
U.S. Department of Agriculture
Washington, DC 20250

Dear Mr. Under Secretary:

The Sweetener Users Association (SUA) strongly supports the use of the newly announced “Partnerships for Climate-Smart Commodities” program for use by any sugar producer or sugar producer organization that has developed an innovative project that reduces greenhouse gases or sequesters carbon. As a trade association representing companies who buy sugar in the United States, we have a keen interest in sugar sustainability.

SUA’s working group for sustainable sugar has crafted “A Framework for On-Farm Sustainability in Sugar” that establishes a number of key parameters for sustainable U.S. sugar production. We believe the sugar sector needs to have credible measurement and verification of continuous improvement efforts that include the following components:

- relevant and ambitious impact targets
- roadmap and action plan for activities
- progress measurement and reporting

We also believe that the sugar industry would benefit from a framework that provides guiding principles as follows:

Materiality Assessment – it is of utmost importance that a sustainability program’s targets be based upon a solid and credible materiality assessment to analyze the sourcing footprint in regard to greenhouse gases, water use, energy use, soil health, yield, biodiversity, and more.

Target Setting – once the primary sustainability indicators are aligned, cost-effective and realistic targets should be created to represent impact change goals. Targets must be measurable, time-bound and based on proven technology and sound science.

Action Plan of Activities – in order to achieve targets, a project should have clarity on the specific program activities that will deliver against goals.

Credible Methodology for Measurement and Verification – sustainability measurement in sugar production should include routine monitoring and impact assessment.

The Natural Resources Conservation Service clearly has the expertise to implement this new program and we look forward to your leadership in advancing the U.S. Department of Agriculture’s critical role in addressing climate change.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Pasco". The signature is fluid and cursive, with a long horizontal stroke at the end.

Richard Pasco
President