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Interpretations of Statutory and Regulatory Provisions and Written Interpretations of FCIC Procedures - Subpart X

Comment On: FCIC-25-0001-0002

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Interpretations of Statutory and Regulatory Provisions and Written Interpretations of FCIC Procedures

Document: FCIC-25-0001-0003

Comment on FR Doc # 2025-10612

Submitter Information

Name: Anonymous Anonymous

General Comment

Notice Title:

Notice of Request for Renewal of a Currently Approved Information Collection: Interpretations of Statutory and Regulatory Provisions and Written Interpretations of FCIC Procedures

Federal Register Citation: 90 FR 24562

Document Number: 2025-10612

Agency: U.S. Department of Agriculture – Federal Crop Insurance Corporation

Date Submitted: August 5, 2025

Comment Deadline: August 11, 2025

Comment:

To Whom It May Concern,

I write regarding the proposed renewal of the information collection concerning requests for written interpretations of statutes, regulations, and FCIC procedures. While this collection plays an important role in maintaining transparency and accessibility in federal crop insurance, I encourage the agency to consider integrating climate and carbon-related context into its interpretive framework.

Why CO₂ and Climate Relevance Matters for FCIC Interpretations:

Climate Change and Actuarial Risk:

Crop insurance is increasingly affected by climate-driven volatility—including droughts, flooding, and heatwaves. Written interpretations of FCIC procedures must be forward-looking, taking into account how CO₂-driven climatic changes are reshaping the baseline assumptions of agricultural risk and productivity.

Policy Interpretation and Environmental Externalities:

Statutory or procedural clarifications that touch on eligibility, program structure, or coverage conditions should be evaluated in light of long-term environmental sustainability, including greenhouse gas implications. Even if not directly addressed in the information collection, interpretations that ignore these trends may gradually erode policy relevance and fiscal soundness.

Cross-Agency Consistency in Climate Considerations:

While Executive Orders 13990 and 14008 have been revoked, climate awareness remains embedded across federal operations, and many USDA policies—especially those related to conservation, resiliency, and soil health—retain a carbon-sensitive outlook. FCIC's interpretive documents should not lag behind in this regard.

Stakeholder Confidence and Transparency:

Farmers, insurers, and researchers increasingly seek clarity on how environmental conditions intersect with federal insurance policy. Including or at least acknowledging carbon-related context in written interpretations would improve stakeholder understanding and regulatory credibility.

Recommendation:

I respectfully request that FCIC consider adding guidance that encourages its legal and policy interpretations to incorporate, where appropriate, climate context and greenhouse gas relevance. This does not require rewriting statutes, but rather aligns interpretive practice with the real-world conditions affecting agriculture today and tomorrow.

Thank you for your time and consideration.

Sincerely,
A Concerned Citizen
Submitted Anonymously
Date: August 5, 2025