# The War on Dairy: Foreign Influence Subverting America's Dairy Sector


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Samantha Fillmore is the Senior State Government Relations Manager for Heartland Impact and the Heartland Institute. Samantha regularly testifies across the country on budget and tax, health care, and energy issues, providing expert testimony to lawmakers while building meaningful, productive relationships that lead to policy success and coordination. Fillmore is currently working with lawmakers across the country to craft and pass conservative-oriented tech and energy policy focused on ensuring America's prosperity through affordable, abundant energy. Samantha is also venturing into the agriculture policy arena, driven by a newfound passion to protect American farmers from onerous ESG mandates.

Sal Nuzzo serves as Executive Director of Consumers Defense. A nationally recognized public-policy strategist with 25 years' experience in analysis, communications, and legislative strategy, he has led work on policy reforms across the country ranging from healthcare to education to energy and environmental regulations and everything in between.
Sal is a widely published author - his writing has been featured in the Wall Street Journal, USA Today, National Review, The Hill, and Newsweek, among others. He's also a trusted advisor to Congressional and White House policy groups, and a sought-after witness before the U.S. Senate Judiciary Committee - where he currently holds the record for the most Taylor Swift lyrics incorporated into one segment of Congressional testimony.

Cameron Sholty is Executive Director of Heartland Impact. He is a Wisconsin native with more than 25 years of experience in politics, public policy, advocacy, and communications. Throughout his career, he has worked at the intersection of public policy and government affairs, advancing free-market solutions and helping policymakers navigate complex economic and regulatory issues.
Sholty has testified before dozens of state legislative committees across the country, with a particular focus on energy policy, free markets, and economic policy. His analysis and perspectives have also been featured extensively in television, radio, and print media. Drawing on decades of political and policy experience, he brings a practical understanding of how public policy is developed, communicated, and ultimately translated into action.

**Heartland Impact is the 501c4 arm of The Heartland Institute. Both are independent, national, nonprofit organizations working to discover, develop, and promote free-market solutions to social and economic problems. Heartland specializes in providing state lawmakers the policy and advocacy resources to advance free-market policies towards broad-based economic prosperity.**

**Consumers Defense is the 501c4 arm of Consumers' Research, the country's oldest consumer protection organization. Our mission is to advance policy that protects Americans from the scourge of ESG in all its forms, in every state, and in every arena where it infects.**

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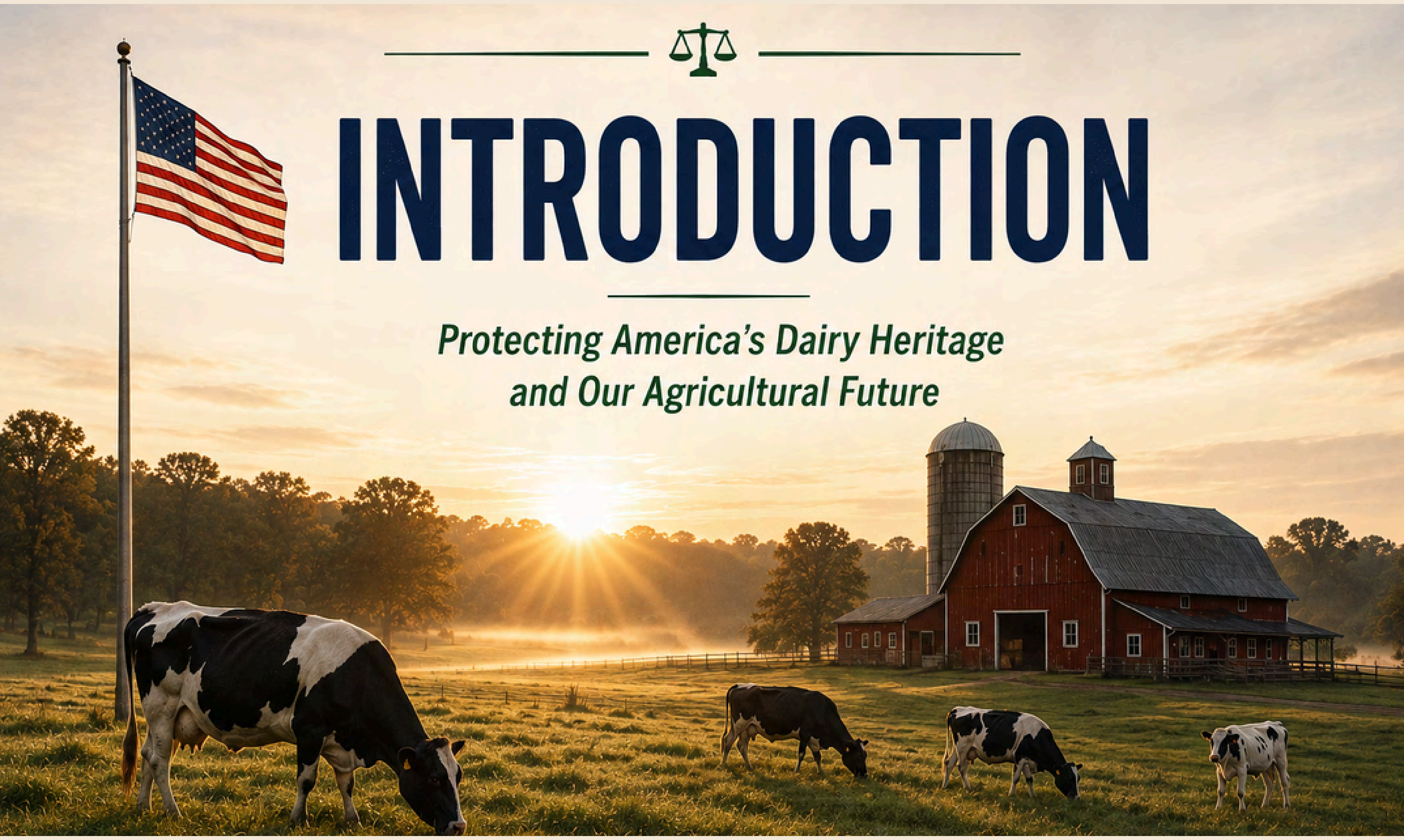



It is early morning; a sleeping mother awakens to her child crying. Eyes heavy, she walks from her bedroom to retrieve her sweet young toddler, just out of babyhood. Little one in tow, the mother walks into her kitchen, toward the refrigerator. She opens the refrigerator door to grab milk for her toddler, hoping to quickly remedy a night of broken sleep with warmed milk, cuddles, and soft lullabies.

This scenario should be innocuous, something every parent encounters. However, if radical globalists have their way, this image could eventually be a long-lost distant memory.

Over the past several decades, opponents of liberty, large-scale corporate leadership, mainstream media, and educational institutions have turned their ire towards carbon in the name of environmentalism and conservation. This has brought about a false narrative that carbon, a naturally occurring element and part of every single aspect of life on Earth, is a threat to the planet in need of total eradication.

This false narrative, that carbon emitted by humans, animals, industry (and their activities) must end to avoid extinction, has become a religious crusade for the progressive movement globally. Most notably, this is the case in the European Union and the United States, where warriors in this crusade advance policy objectives antithetical to American values, individual liberties, and basic human flourishing.

The quest to eliminate carbon emissions has manifested in various forms over the years, with net zero as the poster child of its latest iteration.

The concept of net zero originated less than 20 years ago. In 2009, a paper attempted to make a scientific connection between carbon emissions and global warming (or the newly-coined term man-made climate change).[1]

***Therefore, net zero operates less as a climate solution than as a signal of corporate, governmental, and institutional alignment without any debate about actual efficacy or practicality.***

That paper eventually made its way to the 2015 United Nations Climate Change Conference, also referred to as COP21, where a strategic policy path was devised in which countries would commit to eliminating all carbon emissions by a specified date – and thus, net zero was born.[2]

From the outset, net zero was sold as an achievable goal that all reasonable people must endorse for the good of the planet. Framed as a bulwark against reaching a planetary warming tipping point, in physical terms, it is anything but.

Net zero merely reflects an accounting balance, not a thermodynamic or environmental condition. Atmospheric physics does not recognize these balances.[3] Our global climate responds to concentrations, feedback, and variability – not corporate emissions ledgers or promises from globalist leaders.

Therefore, net zero operates less as a climate solution than as a signal of corporate, governmental, and institutional alignment without any debate about actual efficacy or practicality.

In fact, many of the most egregious ideas and proposals have made their way into mainstream American policy debates, by way of the World Economic Forum, purported by the world’s wealthy and powerful elites. Their stances offer a mere glimpse into their beliefs on how the masses of the global population should behave:

- "I do think all rich countries should move to 100% synthetic beef. You can get used to the taste difference, and the claim is they're going to make it taste even better over time," – Bill Gates, Microsoft Founder
- “We are making the UK the world’s first net zero-aligned financial center.” – Rishi Sunak, UK Prime Minister, COP26 period as Chancellor

[1] Susan Solomon et al., “Irreversible climate change due to carbon dioxide emissions,” PNAS, 2009, https://pubmed.ncbi.nlm.nih.gov/19179281/.
[2] United Nations, “The Paris Agreement,” Climate Action, accessed 2026, https://www.un.org/en/climatechange/paris-agreement.
[3] Oxford Smith School of Enterprise and the Environment, “Revised Oxford Principles for Net Zero Aligned Carbon Offsetting,” 2024, https://www.smithschool.ox.ac.uk/sites/default/files/2024-02/Oxford-Principles-for-Net-Zero-Aligned-Carbon-Offsetting-revised-2024.pdf.

- "Net zero is the only credible path forward… Every country, city, financial institution and company should adopt plans for transitioning to net zero emissions by 2050." – António Guterres, UN Secretary-General
- "Sustainability will be at the center of how we invest… including how we think about food and agriculture systems."– Larry Fink, CEO, BlackRock
- "Climate-smart agriculture offers a win-win—creating new revenue streams for farmers while reducing greenhouse gas emissions." – Tom Vilsack, U.S. Secretary of Agriculture 2009-2017 and 2021-2025
- "U.S. farmers are on the frontlines of climate change… but they're also part of the solution." – Joe Biden, former U.S. President
- "Climate-smart agriculture increases productivity, enhances resilience, and reduces emissions where possible." – World Bank
- "Our future depends on transforming how food is grown… regenerative agriculture is central to that effort." – Jim Anderew, Chief Sustainability Officer, PepsiCo

At every juncture, climate change zealots have sought to restructure the entire economic system to fit their irrational beliefs. From the ivory towers of the European Union, to the compound walls of Zhongnanhai, to the glitz and glam of the World Economic Forum, to the American higher education system, there is a push for policies that would cripple the domestic agriculture industry and force Americans into a state of dependency on the nation's biggest geopolitical rivals. Most notably, the Chinese Communist Party (CCP).

***"I do think all rich countries should move to 100% synthetic beef. You can get used to the taste difference, and the claim is they're going to make it taste even better over time," – Bill Gates, Microsoft Founder***

America's largest adversary has been funding pro-net-zero policy in the halls of Congress and across the states to accomplish two critical goals. Net zero's effects on U.S. agricultural industries unequivocally wounds American farmers, affects the food supply, increases the cost of food for Americans, and negatively impacts the overall economy – all things that would benefit those who want to see America fail.

In addition, when American agricultural industries are strained, Chinese companies fill the gap. Consequently, while U.S.-based farmers suffocate from net-zero regulations and compliance, CCP-owned and controlled producers gain market control.

The attacks on American agriculture take many forms – from discriminating against the use of diesel and gasoline-powered farming equipment in the lending market, to corporate shareholder resolutions calling on food companies to "reduce greenhouse gas emissions" by cutting beef production.[4] Regardless of the tactic, they share a common objective: to create a world in which every single human is under the thumb of a global set of rules that would ensure more pain and misery.

This brief unpacks one specific (and rather insidious) attack on American farmers in the name of climate change. Pathways to Dairy Net Zero uses the guise of climate change to go after the American dairy industry – and if allowed to continue, this environmental, social, governance (ESG) scheme would bankrupt American farmers, make food unaffordable for many Americans, increase reliance on the Chinese Communist Party, and degrade American sovereignty.

"***U.S. farmers are on the frontlines of climate change… but they're also part of the solution." – Joe Biden, former U.S. President***

[4] Staff Reports, "Letter: Banning gas-powered equipment would hurt farmers," Capital Press, 2024, https://capitalpress.com/2024/01/26/letter-banning-gas-powered-equipment-would-hurt-farmers/.


What's being sold to Americans as a "voluntary, science-based" effort to make dairy more sustainable deserves much closer examination. Beneath the polished language of the Pathways to Dairy Net Zero initiative lies a scheme far more consequential: a quiet but powerful restructuring of how American agriculture operates.[5]

At first glance, P2DNZ sounds harmless, even admirable. Who wouldn't support cleaner practices or environmental stewardship? But this initiative doesn't exist in a vacuum. It follows a now-familiar pattern seen across global ESG and net-zero movements.

***What begins as "guidance" quickly becomes obligation. In the end, American small farmers are left decimated.***

First comes uncertain and often contested climate modeling. That modeling is then translated into rigid and arbitrary accounting targets. Those targets evolve into ESG frameworks. And those frameworks, in turn, are enforced, not by voters or legislators, but by multinational banks, corporations, boardrooms, and contract terms buried deep in supply chains.

What begins as "guidance" quickly becomes obligation. In the end, American small farmers are left decimated.

[5] Pathways to Dairy Net Zero, "Home Page," accessed 2026, [4] Staff Reports, "Letter: Banning gas-powered equipment would hurt farmers," Capital Press, 2024, https://capitalpress.com/2024/01/26/letter-banning-gas-powered-equipment-would-hurt-farmers/.

In November of 2021, Tom Vilsack, Secretary of Agriculture under Presidents Barack Obama and Joe Biden, affirmed the U.S. Department of Agriculture's (USDA) involvement in Pathways to Dairy Net Zero at the 26th United Nations Climate Change Conference of the Parties (COP26).[6] Vilsack first announced the USDA's involvement during the U.N. Climate Week in September 2021 and claimed that P2DNZ would, "[Position] U.S. farmers, ranchers and forest landowners as leaders in addressing climate change, while at the same time creating new market opportunities for them through pilot projects that invest in science, monitoring and verification to measure the benefits of climate-smart production practices." What members at COP26 and Vilsack deeply neglected to understand was how harmful these global compliance metrics are for American farmers and that the positive effects on our climate are negligible at best.

For dairy farmers, especially small- and mid-sized operations, the P2DNZ obligation carries a heavy cost. P2DNZ effectively embeds climate compliance into the financial and commercial lifelines of the industry. This strikes at the mechanisms for how farmers access credit, who processes their milk, who buys their milk, and under what conditions they can continue operating. The burden doesn't fall on distant institutions or multinational coalitions. It falls squarely on the people milking cows before sunrise, managing tight margins, and trying to pass their family farms on to the next generation.

And for what measurable gain?

Even under the most aggressive assumptions, eliminating all emissions from U.S. dairy production would have no detectable impact on global climate trends. That's not a political statement – it is simply a matter of scale. Yet the economic consequences are not theoretical. Farmers face rising compliance costs. Consumers face higher prices at the grocery store. And the industry itself faces increasing consolidation, as smaller producers struggle to keep up with mandates they had zero role in shaping.

***Americans should be asking a simple question: when did the future of our food supply become governed not by farmers or elected representatives, but by private (and unelected) foreign interest groups tied to ESG and net zero ambitions?***

This the uncomfortable truth at the heart of P2DNZ: it is less about environmental outcomes and more about control. It shifts decision-making power away from independent producers and toward a network of globalist financial and corporate actors, many of whom are not concerned with the interests of average Americans, and, in the worst case, are outright adversaries of America.

[6] U.S. Department of Agriculture, "USDA Underscores Commitment to Climate Action at COP26," accessed 2026, https://www.usda.gov/about-usda/news/press-releases/2021/11/05/usda-underscores-commitment-climate-action-cop26.

It is unclear why former USDA leadership would voluntarily become involved with a globalist, corporatist agenda that, in practice, has harmed small- and mid-sized American farmers who are left without representation and jeopardizes the networks of our American food supply.

Americans should be asking a simple question: when did the future of our food supply become governed not by farmers or elected representatives, but by private (and unelected) foreign interest groups tied to ESG and net zero ambitions?

The American dairy industry is not alone. This is the story of how globalists in the name of net zero are targeting your milk for your morning cereal and your ice cream sundae.


Modern climate policy is routinely justified as a response to scientific certainty. However, the true underlying science does not support the claim for the necessity of the knee-jerk policy pursuits championed under the guise of humanitarianism.

Global climate models (GCMs) are the foundation of net zero policy. But they are not empirical observations. They are scenario-driven simulations dependent on assumptions about climate sensitivity, various sources of feedback, and future emissions pathways.[7] A growing body of peer-reviewed literature demonstrates that most widely used models systematically overestimate warming relative to satellite and surface observations, particularly in the troposphere.[8]

***Scientific uncertainty in net-zero claims is acknowledged in climate science literature but completely ignored in governance policy.***

Climate sensitivity remains unresolved. The Intergovernmental Panel on Climate Change (IPCC) ranges span outcomes differing by multiple degrees Celsius, yet policy frameworks frequently treat upper-bound projections as inevitable.

[7] US Department of Agriculture Climate Hubs, "Basics of Global Climate Models," November 5, 2021, https://www.climatehubs.usda.gov/hubs/northwest/topic/basics-global-climate-models.
[8] Judith A. Curry and Peter J. Webster, "Climate Science and the Uncertainty Monster," Bulletin of the American Meteorological Society, 2011, https://journals.ametsoc.org/view/journals/bams/92/12/2011bams3139_1.xml.; Anne M. Stark, "New analysis helps reconcile differences between satellites and climate models," Lawrence Livermore National Laboratory, 2022, https://www.llnl.gov/article/49246/new-analysis-helps-reconcile-differences-between-satellites-climate-models.

Natural variability, cycles, solar influences, and cloud dynamics continue to exert substantial influence in reality yet remain imperfectly represented in the models that are used.[9]

Despite these uncertainties, the results of climate change and net-zero timelines are presented as non-negotiable. Scientific uncertainty in net-zero claims is acknowledged in climate science literature but completely ignored in governance policy.

[9] Judith A. Curry and Peter J. Webster, "Climate Science and the Uncertainty Monster," Bulletin of the American Meteorological Society, 2011, https://journals.ametsoc.org/view/journals/bams/92/12/2011bams3139_1.xml.


"Net zero" is widely framed as being a bulwark against reaching a planetary warming tipping point. In physical terms, it is not.

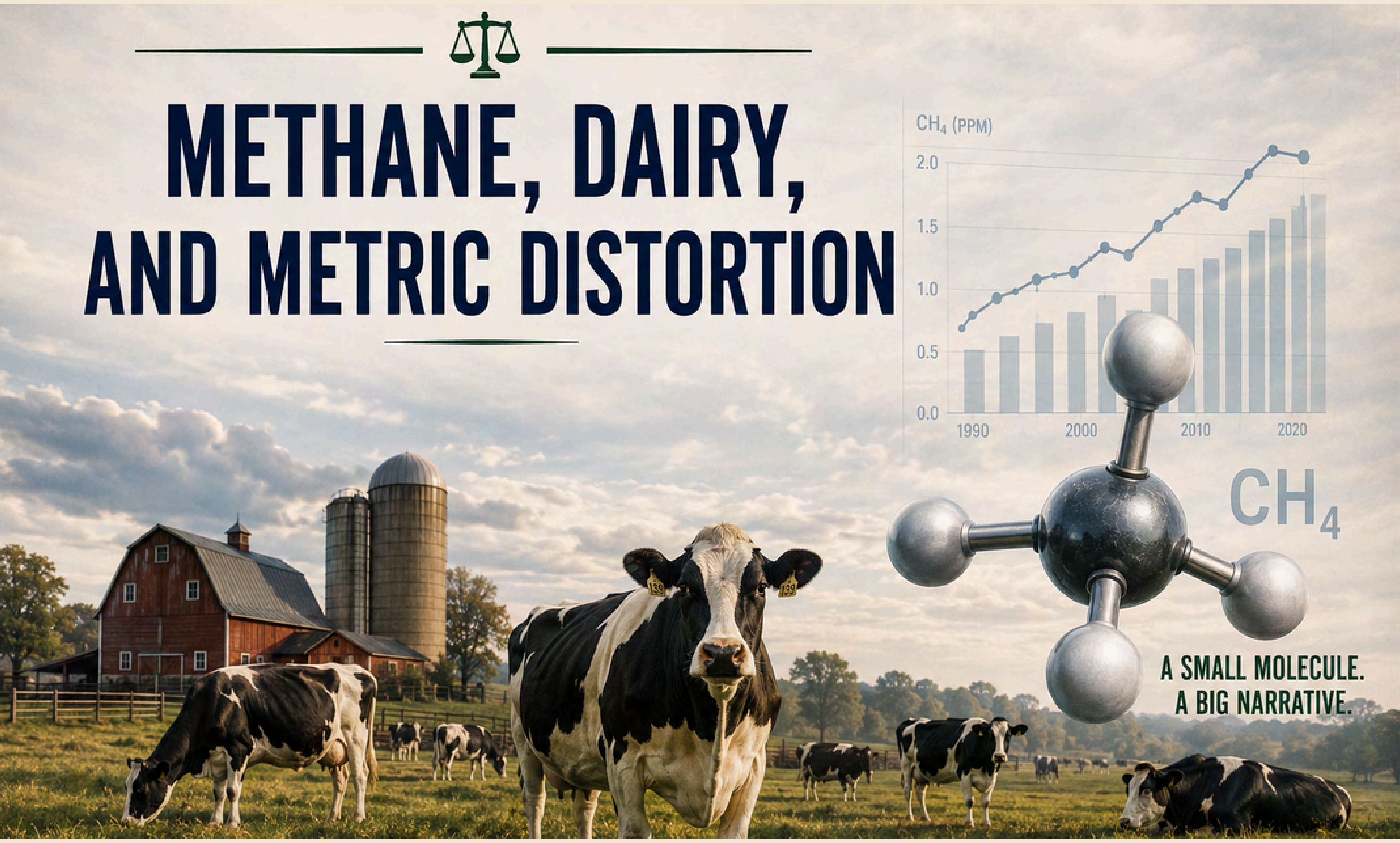
Net zero reflects an accounting balance, not a thermodynamic or environmental condition. It is typically achieved by combining modeled emissions reductions with offsets or "netting" mechanisms. Atmospheric physics does not recognize these balances.[10] The real-world climate responds to concentrations, feedback, cycles, and variability – not corporate emissions ledgers or social posturing.

The fragility of net zero accounting is well documented.

Voluntary offset programs frequently overstate emissions reductions and rely on counterfactual baselines that cannot be empirically verified.[11] Corporate demand for offsets tends to concentrate on lower-quality credits that are cheaper and easier to procure, further weakening the link between net-zero claims and real-world atmospheric outcomes.[12]

Net zero therefore operates less as a climate solution than as a signal of corporate, governmental, and institutional alignment.

[10] Oxford Smith School of Enterprise and the Environment, "Revised Oxford Principles for Net Zero Aligned Carbon Offsetting," 2024, https://www.smithschool.ox.ac.uk/sites/default/files/2024-02/Oxford-Principles-for-Net-Zero-Aligned-Carbon-Offsetting-revised-2024.pdf.
[11] Thales A. P. West et al., "Overstated Carbon Emission Reductions from Voluntary REDD++ projects in the Brazilian Amazon," PNAS, 2020, https://www.pnas.org/doi/10.1073/pnas.2004334117.
[12] Gregory P. Trencher et al., "Demand for Low-Quality Offsets by Major Companies Undermines Climate Integrity of the Voluntary Carbon Market," Nature Communications, 2024, https://www.nature.com/articles/s41467-024-51151-w.




The heart of net zero frameworks for dairy producers centers on methane emissions. Yet methane is among the most misrepresented gases in climate accounting and literature.

Methane is a short-lived climate pollutant. Its warming effect depends on emissions trajectories, not cumulative stock. Unwavering methane emissions do not produce continuously rising temperatures as most proponents of ESG believe. [13]

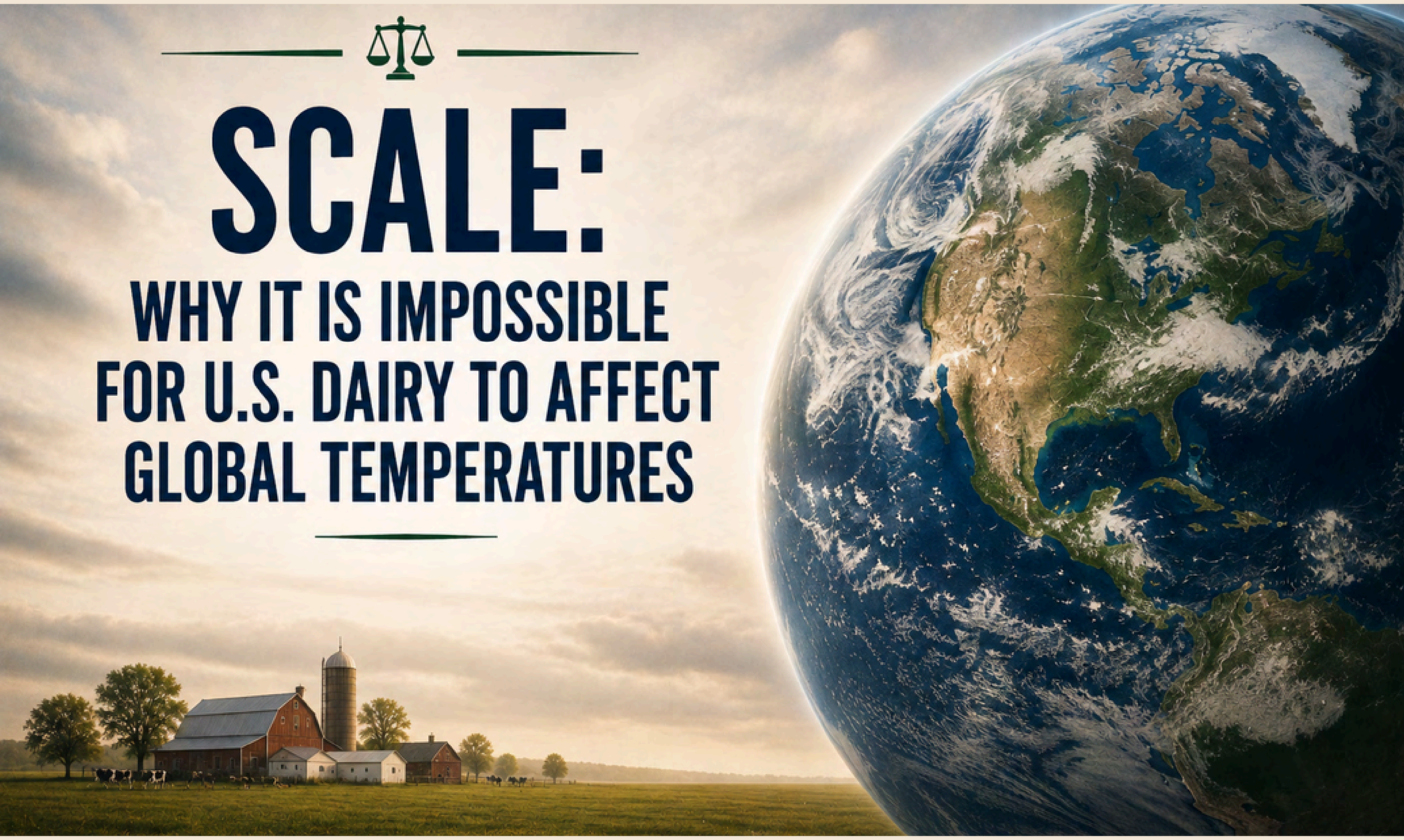
Nevertheless, most ESG and net zero frameworks rely on 100-year $CO_2$-equivalent metrics that exaggerate methane's long-term warming impact and distort policy incentives.[14] Alternative metrics such as Global Warming Potential (GWP) were developed precisely to correct this distortion but are largely ignored because they complicate ESG compliance narratives.

As a result of this misrepresentation, dairy producers are asked to adhere to arbitrary standards that levy substantial additional operational costs for, at best, a marginal climate benefit.

***Yet methane is among the most misrepresented gases in climate accounting and literature.***

[13] Myles R. Allen et al., "A Solution to the Misrepresentations of $CO_2$-Equivalent Emissions of Short-Lived Climate Pollutants under Ambitious Mitigation," Climate and Atmospheric Science, vol. 1, 2018, https://www.nature.com/articles/s41612-018-0026-8.

[14] Paul Balcombe et al., "Methane Emissions: Choosing the Right Climate Metric and Time Horizon," Environmental Science: Processes & Impacts, vol. 20, no. 10, 2018, https://pubs.rsc.org/en/content/articlelanding/2018/em/c8em00414e.




Even accepting worst-case climate projections, scale alone defeats the P2DNZ justification.

The United States contributes roughly 13–14 percent of global greenhouse gas emissions.[15] Agriculture accounts for about 10 percent of U.S. emissions, and dairy is only a fraction of that total.

Eliminating all U.S. dairy emissions would reduce global emissions by only a few tenths of a percent, far below any detectability. Integrated assessment models consistently show that aggressive national decarbonization produces temperature changes measured in hundredths of a degree Celsius by the year 2100.[16]

***The climatic impact of P2DNZ is symbolic, not physical or scientific. It is an exercise in economic destruction without any benefit whatsoever.***

The climatic impact of P2DNZ is symbolic, not physical or scientific. It is an exercise in economic destruction without any benefit whatsoever.

[15] US Environmental Protection Agency, “Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022,” 2024, https://www.epa.gov/system/files/documents/2024-04/us-ghg-inventory-2024-main-text_04-18-2024.pdf.
[16] Bjørn Lomborg, “Impact of Current Climate Proposals,” Global Policy, 2015, https://onlinelibrary.wiley.com/doi/10.1111/1758-5899.12295.


If net zero were purely aspirational, it would be benign. The danger of net zero commitments lies in the ability to convert speculative climate claims into binding economic constraints.

Through ESG ratings, disclosures, and risk frameworks, radical environmental globalists pushing climate narratives shape lending, insurance, and procurement decisions.

***The net is cast to every company, business, and farmer, large and small.***

Financial institutions increasingly treat deviation from net-zero pathways as "transition risk," embedding contested assumptions into capital allocation.[17] The confluence of these factors has led to the creation of the Corporate Value Chain (Scope 3) Accounting and Reporting Standard.[18] With Scope 3, a company is assessed on the impact of its carbon emissions throughout its entire production and supply chain. This is everything from the emissions related to the acquisition of the materials they use, their factory or production line carbon output, the carbon output related to shipping and distribution, plus the emissions of everyone the company does business with. This approach is rather insidious – it forces small- and mid-sized companies to comply if they want to do business with larger companies. The result is carbon emission reduction requirements for everyone.

The net is cast to every company, business, and farmer, large and small.

[17] Bank for International Settlements, "Climate-Related Risk Drivers and their Transmission Channels," 2021, https://www.bis.org/bcbs/publ/d517.pdf.
[18] GHG Protocol, "Corporate Value Chain (Scope 3) Standard," 2011, https://ghgprotocol.org/corporate-value-chain-scope-3-standard.

Scope 3 accounting provides an enforcement mechanism. By assigning emissions responsibility across value chains, it shifts compliance burdens onto suppliers, mostly farmers, who lack representation in these discussions or bargaining power (GHG Protocol).

Here's how it works. Major multinational, multi-trillion-dollar business (for our hypothetical example, ABC Enterprises) embraces the net zero path and deploys a Scope 3 assessment. Under this scenario, ABC develops/invents a calculation to gauge how much carbon is emitted by each of the companies that contract with, supply, or partner in some way with ABC. Further, ABC then requires every company in its orbit to develop their own carbon mitigation strategies, or risk being jettisoned.

Now, let's make the hypothetical more real. If Land O' Lakes were to embrace Scope 3 reductions, every dairy farmer in America who hopes to sell their milk to Land O' Lakes would be left with a dilemma – embrace a business model that would destroy the future of your small farm operation, or abandon Land O' Lakes' market share. If there is a thriving market, this would be a part of what we embrace as free-market capitalism. When only a handful of massive companies control the market and dictate the terms, it is antithetical to free-market capitalism.

*Land O' Lakes is a sponsor for Pathways to Dairy Net Zero.[19]

Thus, P2DNZ functions as private regulation enforced through mafia-style tactics rather than law.

[19] Pathways to Dairy Net Zero, "Meet our Supporters," accessed 2026, https://pathwaystodairynetzero.org/our-supporters/.


P2DNZ closely mirrors global ESG coalitions such as the Glasgow Financial Alliance for Net Zero (GFANZ).[20]

GFANZ publicized a restructuring initiative in 2025, stating that they would shift their focus to addressing barriers to mobilizing capital and away from their initial goals that were born at the 2021 United Nations Climate Change Conference (COP26).[21]

However, this does not mitigate the fact that GFANZ was the original roadmap that set the standard for how multinational organizations could impose undemocratic ESG standards on whatever industry they set their sights on.

***P2DNZ closely mirrors global ESG coalitions such as the Glasgow Financial Alliance for Net Zero (GFANZ).***

In its original form, GFANZ coordinated banks, insurers, and asset managers around net zero targets. It did not legislate. Instead, it embedded climate objectives into lending standards, underwriting practices, and portfolio construction. Firms that failed to align with their climate objectives faced higher capital costs or outright exclusion.

[20] Glasgow Financial Alliance for Net Zero, "Home Page," accessed 2026, https://www.gfanzero.com/.
[21] Glasgow Financial Alliance for Net Zero, "2025: New Year Update from GFANZ Secretariat," accessed 2026, https://www.gfanzero.com/press/2025-new-year-update-from-gfanz-secretariat/.

As previously stated, GFANZ announced a restructuring at the beginning of 2025 after mounting public pressure highlighted how undemocratic and insidious their practices have been for Americans and the entire global economy. Public pressure campaigns like those from Consumer's Research, The Heartland Institute, and others cited in this report have turned up the heat in ways that forced their hand regarding their institutional reform.

***With each model, costs fall on those with the least leverage, impacting hard-working small-scale American farmers with greatest severity.***

Yet the playbook has already been written, and every carbon-emissions-focused multinational organization can deploy the same plays.

P2DNZ applies the same logic to agriculture:

- P2DNZ methane emission targets are framed as science-based and inevitable.
- P2DNZ utilizes accounting frameworks to define compliance, rather than governance, legislation, or science.
- P2DNZ requires intermediaries to transform dairy-producing operations into ESG-acceptable metrics.
- P2DNZ weaponizes market access and financial prosperity on the condition of ESG and ideological alignment.

With each model, costs fall on those with the least leverage, impacting hard-working small-scale American farmers with greatest severity.


Net zero governance creates a perpetual compliance economy.

Compliance is continuous through data collection, verification, recalibration, audits, and reporting. Farms generate raw data, but value is captured by intermediaries who convert it into “audit-ready” ESG outputs.

Firms such as Ever.Ag explicitly market ESG-aligned, framework-compliant data systems. Access to markets increasingly depends not on productivity, but on the ability to navigate an increasingly complex compliance infrastructure.

***Risk is socialized downward. If targets fail or frameworks change, producers bear sunk costs. Meanwhile, intermediaries and corporations retain reputational upside regardless of outcomes.***

Risk is socialized downward. If targets fail or frameworks change, producers bear sunk costs. Meanwhile, intermediaries and corporations retain reputational upside regardless of outcomes.


P2DNZ's effectiveness derives not from law, but from coordination among powerful (and unelected) bureaucratic institutions.

Federal agencies, multinational corporations, NGOs, industry groups, and ESG service providers appear together under a single banner, adopt a common language, rely on shared frameworks, and reinforce one another's expectations. Publicly traded participants show overlapping institutional ownership by large asset managers.[22] If a single asset manager controls the shares of a series of companies integrated (vertically or horizontally), the governance of those companies can be manipulated to fit whatever agenda the asset manager favors. This is the antithesis of free enterprise – it is taking free enterprise and flipping it on its head in the name of an agenda – an agenda that will ultimately destroy American economic independence and authority.

Further, this alignment does not require an explicit agreement and produces collusive outcomes via uniform standards, synchronized pressure, and limited avenues for dissent. Farmers face a unified and daunting front including government legitimacy, procurement power, financial leverage, and reputational enforcement. And worst of all, no single actor bears liability for the downstream consequences, and all actors are presently insulated from any liability for the lack of fiduciary primacy.

***P2DNZ's effectiveness derives not from law, but from coordination among powerful (and unelected) bureaucratic institutions.***

[22] Heng Geng et al., "Common institutional investors and board representation in rival firms," Journal of Corporate Finance, vol. 94, 2025, https://www.sciencedirect.com/science/article/abs/pii/S092911992500104X.


The economic consequences of P2DNZ are not incidental; they are structural.

Net zero compliance introduces fixed costs into dairy production through monitoring systems, reporting requirements, third-party verification, consultant fees, and capital investments. Fixed costs are inherently regressive. Large operations can spread them across volume; small- and mid-sized farmers and producers cannot.

As margins tighten, smaller producers exit the field and assets consolidate, shifting market power upward. Put simply, small farmers are forced to sell to larger operations, which then get rolled up further into massive global enterprises. Supply chains become less robust and more fragile. This fragility is masked in the short term but revealed during shocks like weather events, disease outbreaks, or input disruptions.

Furthermore, in agriculture, a fragile supply chain opens the nation to food shortage vulnerabilities as an issue of national defense and national security, particularly during wartime.[23]

***In any circumstance, consumers ultimately foot the bill.***

In any circumstance, consumers ultimately foot the bill.

[1] The White House, "Promoting The National Defense By Ensuring An Adequate Supply of Elemental Phosphorus and Glyphosate-Based Herbicides," February 18, 2026, https://www.whitehouse.gov/presidential-actions/2026/02/promoting-the-national-defense-by-ensuring-an-adequate-supply-of-elemental-phosphorus-and-glyphosate-based-herbicides/.

Compliance costs are embedded in food prices, processing costs, and retail margins. The result is higher prices for staple goods in exchange for climate “benefits” that are too small to measure.

***A climate policy that increases food prices while delivering no detectable impact is not precautionary; it is regressive and inhumane.***

However, unlike the negligible difference net zero policies make in carbon emissions or global warming, the economic effects of harmful ESG policies on farmers and consumers are measurable, stark, and shocking. A model farm was used to simulate how cumbersome net zero policies would affect American farmers – to scale. If farmers were to follow the Biden administration’s suggested net zero policies, farmers would see a 34 percent increase in annual operating costs. Furthermore, American families would face a 15 percent increase in annual grocery bills.[24]

A climate policy that increases food prices while delivering no detectable impact is not precautionary; it is regressive and inhumane.

[24] Trevor W. Lewis and M. Ankith Reddy, “Net-Zero Climate-Control Policies Will Fail the Farm,” Economic Research Center, The Buckeye Institute, 2024, https://www.buckeyeinstitute.org/library/docLib/2024-02-07-Net-Zero-Climate-Control-Policies-Will-Fail-the-Farm-policy-report.pdf.

# USDA AND NET ZERO:
## A CONFLICT WITH U.S. AGRICULTURAL INTERESTS


During the Biden-Harris administration, the U.S. Department of Agriculture's involvement in P2DNZ was especially problematic.

The USDA had formally aligned with the federal government's economy-wide goal of net zero emissions by 2050 and had embedded this objective into agency planning, grantmaking, and program design. These strategies included the USDA Climate Adaptation and Resilience Plan and USDA Partnerships for Climate-Smart Commodities.[25]

This posture placed the USDA in the role of net zero advocate rather than agricultural defender. The Biden administration labeled it as "voluntary" but conditioned access to funding, pilot markets, and future opportunities on participation in climate accounting regimes.

***During the Biden-Harris administration, the U.S. Department of Agriculture's involvement in P2DNZ was especially problematic.***

For American agriculture, this was antithetical to core interests:

- It prioritized global climate narratives over domestic competitiveness.
- It conditioned market access on compliance rather than productivity.

[25] U.S. Department of Agriculture, "USDA Releases Updated Climate Adaptation and Resilience Plan," June 20, 2024, https://www.usda.gov/about-usda/news/press-releases/2024/06/20/usda-releases-updated-climate-adaptation-and-resilience-plan.; U.S. Department of Agriculture, "Partnership for Climate-Smart Commodities - Legacy Site," accessed 2026, https://www.usda.gov/climate-solutions/climate-smart-commodities.

- It exposed farmers to ESG-driven cost structures not faced by foreign competitors.
- It accelerated consolidation in the name of climate signaling.

***The USDA's historical mission is to promote agricultural productivity, stability, and food security.***

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Aligning the sector with speculative net-zero objectives, particularly when global competitors do not, is a substantial, and some would say egregious, departure from that mission.


Concerns about net zero-driven restructuring of American agriculture extend well beyond domestic regulatory debates. Increasingly, analysts and policymakers are asking a harder question: who ultimately benefits when the United States constrains its own agricultural productivity?

For some, the answer points uncomfortably toward foreign strategic competitors, most notably the Chinese Communist Party (CCP). At the center of this concern is the growing intersection between net zero-aligned advocacy and global economic competition.

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Reporting and analysis from State Armor suggest that entities with alleged ties to the CCP, including Energy Foundation China (EF China), have played a role in supporting U.S.-based environmental initiatives aimed at tightening restrictions on key agricultural inputs such as pesticides and fertilizers.[26] While these efforts are publicly framed as sustainability measures, critics argue they may have the secondary effect of undermining the competitiveness of American producers.

One of the most frequently cited examples is the sustained legal and political campaign targeting Bayer following its acquisition of Monsanto, particularly over glyphosate-based products like Roundup. Litigation, regulatory pressure, and

[26] State Armor, "Who Is Energy Foundation China?" 2025, https://statearmor.org/wp-content/uploads/2025/06/State-Armor-Who-is-Energy-Foundation-China-Report.pdf.

shareholder activism have combined to place enormous strain on one of the world's largest agricultural input providers. If such pressure were to significantly weaken or eliminate major U.S. or Western firms from the market, the vacuum would not remain empty. Instead, it would be filled by competitors operating under very different political and regulatory systems.

***When that shift favors a geopolitical competitor or adversary, the implications extend far beyond agricultural policy.***

Enter China.

Chinese state-backed enterprises such as Sinochem, ChemChina, and Syngenta now hold a dominant position in global seed, pesticide, and fertilizer markets. Consequently, China exerts significant control over agricultural competitors to the United States. This positioning gives the CCP not just market share, but market influence over critical nodes in the global food production system. In an environment where U.S. farmers and processors face mounting ESG-related compliance costs and legal risks. Chinese state-controlled farmers and processors, supported by state capital and shielded from onerous ESG-based regulatory burdens, stand to gain a decisive competitive edge.

This dynamic is not occurring in a vacuum. The U.S.-China Economic and Security Review Commission has repeatedly warned of China's long-term strategy to secure food supply chains through overseas investment.[27] These efforts span farmland acquisitions, grain storage, transportation infrastructure, livestock operations, and advanced agricultural technologies. At their core lies a straightforward objective: reduce China's domestic vulnerabilities while increasing its leverage over global food systems. And perhaps as a bonus in the same breath: weakening America's domestic vulnerability.

From this perspective, ESG-driven constraints on American agriculture take on a new dimension. Policies that limit the use of widely adopted farming tools and machines, restrict fertilizer application, burden farmers, or increase the cost of production not only harm farmers and their prosperity, but also risk shifting production, market share, and technological leadership abroad. When that shift favors a geopolitical competitor or adversary, the implications extend far beyond agricultural policy.

Organizations like the America First Policy Institute have highlighted the scale of this risk, noting that Chinese state-controlled firms already command significant portions of global seed, pesticide, and fertilizer markets.[28] The concern is not merely economic; it's strategic. Dependence on foreign-controlled inputs,

[27] Lauren Greenwood, "China's Interests in U.S. Agriculture: Augmenting Food Security through Investment Abroad," U.S.-China Economic and Security Review Commission, 2022, https://www.uscc.gov/research/chinas-interests-us-agriculture-augmenting-food-security-through-investment-abroad.

[28] Kip Tom and Royce Hood, "China-Dominated U.S. Agricultural Sectors Are a National Security Threat," American First Policy Institute, 2025, https://www.americafirstpolicy.com/issues/china-dominated-u.s-agricultural-sectors-are-a-national-security-threat.

particularly from a rival power, introduces vulnerabilities that can be exploited in times of political or economic conflict. Under no circumstances should public policy be used to create a scenario in which large segments of our food production system are under the thumb of a geopolitical foe. The results would be potentially catastrophic – diplomatically, economically, and potentially even militarily.

These concerns have begun to gain traction in Washington. Rep. Lance Gooden (R-TX) and others have called for investigations into potential links between Chinese-affiliated funding sources and ESG advocacy networks operating in the United States.[29] While these allegations remain contested and subject to ongoing scrutiny, they reflect a deeper unease about the opacity of influence in an increasingly interconnected policy landscape.

***ESG and net zero frameworks on agricultural producers, as currently implemented, create incentives that disproportionately burden domestic producers while leaving foreign competitors relatively unscathed.***

ESG and net zero frameworks on agricultural producers, as currently implemented, create incentives that disproportionately burden domestic producers while leaving foreign competitors relatively unscathed.

This is where the risk becomes most acute.

Agriculture is not just another sector of the economy; it is the foundation of national security, economic stability, human survival, and human prosperity. Incremental shifts in who controls inputs, production capacity, and distribution networks may seem manageable in isolation. But taken together, they erode resilience, hollow out domestic capability, and increase reliance on potentially bad actors whose interests do not align with those of the United States.

Net zero agricultural policies should be evaluated not only for their supposed environmental impact, but for their geopolitical consequences. In a world defined by strategic competition, even well-intentioned reforms can carry unintended costs. If those costs include ceding control over the food system to foreign adversarial powers, the long-term implications demand far greater scrutiny.

[29] Lance Gooden, "Gooden Calls for DOJ investigation into PRC Manipulation of U.S. Energy, Environmental Policy," 2025, https://gooden.house.gov/2025/11/gooden-calls-for-doj-investigation-into-prc-manipulation-of-u-s-energy-environmental-policy.


In April of 2021, the Sri Lankan government banned synthetic agrochemicals, including chemical fertilizers and pesticides, in farming, seemingly overnight, making them the world's first fully organic farming nation.[30] While that sounds lovely in theory, the reality is anything but. Just seven months later, the Sri Lankan government was forced to rescind the ban on agrochemicals after rice harvests dropped 32 percent and tea harvests fell by 18 percent. The agricultural collapse triggered widespread famine, food insecurity, and overall national economic losses, the effects of which can still be felt today. The disastrous meddling with agricultural practices created widespread political unrest that ultimately forced then-president Gotabaya Rajapaksa to flee the country.

***The unfortunate mismanagement of Sri Lanka's farming practices should serve as a cautionary tale to all who consider sweeping reforms on agricultural practices.***

The unfortunate mismanagement of Sri Lanka's farming practices should serve as a cautionary tale to all who consider sweeping reforms on agricultural practices. Unlike Sri Lanka, however (who knew that President Rajapaksa was to blame),

[30] Pay Drechsel et al., "On the feasibility of an agricultural revolution: Sri Lanka's ban of chemical fertilizers in 2021," Food Security, vol. 17, 2025, https://link.springer.com/article/10.1007/s12571-025-01528-6.

American farmers and consumers would be hard-pressed to discover who exactly led to their demise. The boardrooms and multinational coalitions pushing this scheme have been successful in shielding the public from following the thread of accountability.


P2DNZ is not a benign, isolated effort to “modernize” dairy production in the United States. It is the agricultural face of a much larger transformation, one that replaces real-world results with abstract accounting, and democratic oversight with decisions made by unelected bureaucrats behind closed doors, often in foreign lands, and ultimately with little overall consideration for American economic interests.

What’s being sold as “science-based” and “voluntary” increasingly is neither.

Like GFANZ and other global coalitions, P2DNZ hardwires long-contested and inaccurate climate assumptions into the machinery of the economy itself. Net zero becomes a part of how farmers borrow, how they produce, how they sell, and ultimately whether they can survive. Through Scope 3 mandates, procurement requirements, and ESG-driven lending, the burden doesn’t land on distant institutions. It lands on the backs of producers, the men and women and families who feed the country.

***What’s being sold as “science-based” and “voluntary” increasingly is neither.***

And for what? By their own models, their actions would not result in any measurable environmental gains, but rather symbolic posturing and compliance. A dystopian system where checking the right boxes matters more than producing successful outcomes. These consequences do not stop at the farm gate. The ripple effects are far-reaching and far more nefarious. When American farmers are squeezed, costs rise, inputs are restricted, and operations become harder to sustain. Not only will this affect the mother with a young toddler who searches to fill their sippy cup with milk, but it also allows someone else to fill the gaps.

Data shows that "someone else" is foreign adversarial competitors, including CCP state-backed entities. Food production is not just another industry. It is a pillar of national security. Weakening it, even incrementally, carries risks we cannot afford to ignore.

Taken together, the direction is unmistakable. P2DNZ and efforts like it elevate speculative climate metrics over tangible results. They shift risks onto farmers and families. They push the industry toward consolidation and fragility. And they chip away, piece by piece, at America's agricultural independence.

***There are meaningful changes that can be taken to reverse course on the dystopian future of titans of industry using boardroom tactics to crush small farmers.***

This is not a call for agricultural producers to ignore environmental stewardship. After all, farmers have long been some of the best stewards of the land. The land is their livelihood and, oftentimes, their birthright. Rather, we highlight that net zero and ESG-driven metrics are a call to tell them not to believe their eyes and to embrace a system that sidelines them.

We must wholly reject that system.

American agriculture deserves better than to be governed by distant globalist regulatory schemes and opaque standards designed to destroy American food independence. Our farmers deserve policies rooted in evidence, proportionality, and accountability to the public, not to private coalitions or ideological targets. Decisions of this magnitude should be debated openly, in Congress and in state legislatures, where the voices of farmers and consumers can be heard.

There are meaningful changes that can be taken to reverse course on the dystopian future of titans of industry using boardroom tactics to crush small farmers.

First, and most topical to this study, **the United States Department of Agriculture (USDA) can, and should, immediately withdraw from Pathways to Dairy Net Zero**. Moreover, they should unequivocally denounce the P2DNZ project and all other projects that harm American farmers with ESG standards.

Furthermore, **the USDA and the Trump administration should spearhead investigations into these multinational and globalist organizations** through the Office of the United States Attorney General, the Department of Justice, and the

USDA. International and corporate actors using their outsized financial power to squeeze the livelihood of American farmers and disrupt the food supply chain is an affront to free markets, a direct contradiction to the stated goals of this current administration, and an issue of domestic security. It should be treated as such using every prescription of law.

Second, **state attorneys general should lead investigations into P2DNZ and its members' efforts on the state economies and the agricultural producers in their states.** State AGs should leverage their civil investigative authority by investigating potential antitrust violations, but perhaps most importantly, utilizing their consumer protection authority. They should investigate unfair and deceptive trade practices to ensure that large-scale multinational companies are not misleading or harming dairy farmers in their states.

Third, there is an intersection with fiduciary duty under securities laws. **State attorneys general should investigate asset managers and financial institutions involved in prioritizing ESG standards to question their practice in violation of fiduciary obligations to investors and its effects on the agriculture sector.**

There currently exist pathways in state-based legislation that begin the process of insulating farmers from harmful ESG standards imposed on them. This legislation can take a myriad of manifestations, but one more prevalent is the **"Farmer Protection Act."** The Farmer Protection Act, or FPA, combats ESG scoring systems and ensures that farmers are not discriminated against by financial institutions based on legal and accepted practices and inputs used in the operations of a farm or facility.

The FPA would prohibit banks from restricting services to farmers "based, in whole or in part, upon the agriculture producer's greenhouse gas emissions, use of fossil-fuel derived fertilizer, or use of fossil-fuel powered machinery." Further, "If a financial institution has made any ESG commitment, there shall be a rebuttable presumption that the institution's denial or restriction of a financial service to an agriculture producer is a violation" of the FPA. A bank may overcome the rebuttable presumption only by "demonstrating, through clear and convincing evidence, that its denial or restriction of a financial service was based solely on a documented ordinary business purpose, and not on any ESG commitment."

While banking and lending is clearly only one avenue global activists are using to attack farmers, the FPA gets at the heart of the initial issue of ESG and can always be amended or expanded upon to combat the other iterations of ESG policy affecting American agriculture.

However, the FPA is not only limited to state-based policy. There is potential to turn the FPA into federal legislation that would restrict ESG standards from poisoning the banking and lending systems for farmers across the nation – The Farm Credit System.

The Farm Credit System is a government-sponsored network of borrower-owned lending institutions created by Congress to provide reliable credit to agriculture and rural America. It is not a federal agency and does not receive direct congressional appropriations. Instead, it raises money by selling bonds and notes in national and international capital markets, then lends those funds through regional Farm Credit banks and local associations.

Its customers include farmers, ranchers, agricultural cooperatives, rural infrastructure providers, and certain rural homebuyers. Because the system is cooperative, eligible borrowers generally become member-owners and may receive patronage dividends when their association performs well. The system is regulated by the Farm Credit Administration, an independent federal regulator. Its debt is backed by the Farm Credit System Insurance Corporation, not by the full faith and credit of the United States. In practice, it functions as a specialized, mission-driven credit source for agriculture and rural communities.

**Congress should immediately hold hearings into how susceptible its own creation is to ESG metrics that may have permeated and embedded into the system.** To combat this, Congress should pass a series of laws that mirror previous efforts to ensure fair access to banking legislation.[31]

Federal anti-ESG reforms in the agricultural-finance sector would generally aim to keep the Farm Credit System focused on its core mission: providing sound, reliable credit to farmers, ranchers, cooperatives, and rural communities. **Congress should clarify that Farm Credit institutions and their regulators may consider only borrower-specific, financially material risks tied to repayment capacity, collateral value, legal compliance, or safety and soundness.** At the same time, they would be barred from embedding ESG, climate-transition, net-zero, diversity, social-policy, political, or reputational-risk criteria into lending, supervision, bond disclosures, or borrower eligibility standards.

In practice, these proposals would prohibit the denial, restriction, pricing, or conditioning of credit based on a producer's refusal to adopt ESG certifications, emissions targets, carbon accounting, DEI policies, or other non-credit-related mandates.

Congress could also restrict the Farm Credit Administration from using climate stress tests, ESG examination standards, international sustainability frameworks, or reputational-risk guidance to pressure lenders. The result would be a "fair access to agricultural credit" framework that protects lawful agricultural producers from ideological credit discrimination while preserving ordinary underwriting based on real financial risk.

[31] Kevin Cramer, "Cramer Reintroduces Fair Access to Banking Act to Protect Legal Industries from Debanking," February 5, 2025, https://www.cramer.senate.gov/news/press-releases/cramer-reintroduces-fair-access-to-banking-act-to-protect-legal-industries-from-debanking

Lastly, there are legislative and legal mechanisms that can be explored to protect small- and mid-sized American farmers regarding their farmland ownership. Keeping American land in the hands of Americans who want to do good for their community and contribute to the American food supply chain should be given not only protections but priority to American lands.

At the end of the day, this isn't just about emissions targets or reporting standards. It's about who decides the future of American food security and whether the people directly engaged in that effort will still have a say, or if the United States will (either actively or passively) allow our food security to be decided by the likes of the European Union or Chinese Communist Party.

HEARTLAND IMPACT

CONSUMERS DEFENSE

https://heartlandimpact.org
https://consumersdefense.com

## Appendix A

North America–Based Participants in Pathways to Dairy Net Zero (P2DNZ)
The following organizations are identified as participants or supporters of Pathways to Dairy Net Zero and are based in North America, according to P2DNZ's publicly available supporter materials and organizational disclosures as of early 2026.

Pathways to Dairy Net Zero, "Meet our Supporters – A Complete List," accessed August, 2026, https://pathwaystodairynetzero.org/our-supporters/.

United States:

- Bar E Dairy
- Berg Schmidt America
- Brunn Dairy Farm LLC
- Cargill
- The Coca-Cola Company
- Dairy Farmers of America
- Dairy Management Inc.
- Direct Farm Supply
- Elanco Animal Health
- Environmental Defense Fund (EDF)
- Ever.Ag
- Fox Hollow Consulting LLC
- Heifer International
- Hilmar Cheese Company, Inc.
- Innovation Center for U.S. Dairy
- International Dairy Foods Association (IDFA)
- Iowa State University
- JBT Corporation
- Land O'Lakes
- Laurie Fischer Group
- Leprino Foods
- Milk Specialties Global
- Milx Technologies
- National Milk Producers Federation
- Starbucks
- U.S. Agency for International Development (USAID)
- U.S. Dairy Export Council
- U.S. Department of Agriculture (USDA)
- University of Minnesota
- World Wildlife Fund (U.S.)

Canada:

- Lactanet Canada
- Dairy Farmers of Canada

Note: This appendix reflects all North America–based entities visible on the public supporter list, supplemented by clearly identifiable U.S. and Canadian organizations referenced in P2DNZ materials.

## Appendix C

Big Three Institutional Ownership Crosswalk (Public Participants)

This appendix illustrates overlapping institutional ownership among publicly traded North America–based P2DNZ participants.

Holdings are drawn from public "Major Holders" disclosures and reflect structural alignment rather than allegations of explicit agreement.

| P2DNZ Participant | Parent Company | BlackRock | Vanguard | State Street |
|---|---|---|---|---|
| **The Coca-Cola Company** | Cocoa-Cola Co. | ☑ | ☑ | ☑ |
| **Starbucks** | Starbucks Corp. | ☑ | ☑ | ☑ |
| **Elanco Animal Health** | Elanco Animal Health Inc. | ☑ | ☑ | ☑ |

Source: Yahoo Finance Major Holders pages (accessed August, 2026).

Observation: This ownership overlap does not require explicit coordination to produce coordinated outcomes. Shared incentives, standardized disclosures, reduced regulatory uncertainty, and uniform ESG narratives can generate functionally collusive pressure across corporations, lenders, and suppliers.

## Appendix B

North American Participants and Public ESG / Net-Zero Commitments.

This appendix maps North America–based P2DNZ participants to publicly stated ESG, climate, or net-zero commitments, where such commitments are documented. Entities without clear public pledges are omitted to avoid speculation.

| Participant | Public ESG / Net-Zero Commitment (Summary) |
|---|---|
| **The Coca-Cola Company** | Net-zero across value chain by 2050; Scope 3 supplier engagement |
| **Starbucks** | Net-zero by 2050; climate requirements embedded in supplier standards |
| **Cargill** | Net-zero operations and supply chain by 2050 |
| **Elanco Animal Health** | Science-Based Targets Initiative (SBTi)–aligned emissions targets |
| **Land O'Lakes** | Net-zero agriculture and climate-smart supply chain commitments |
| **Dairy Management Inc.** | Climate-smart dairy and emissions-reduction initiatives |
| **Environmental Defense Fund** | Advocacy for net-zero-aligned agricultural policy |
| **USDA** | Alignment with federal net-zero-by-2050 goal; climate-smart agriculture programs |
| **Ever.Ag** | Ever.Ag<br>ESG and climate reporting infrastructure aligned with GHG Protocol frameworks |

Observation: While these commitments vary in specificity, they converge on a shared net-zero framing, reinforcing uniform expectations across procurement, finance, and supply chains.

**Contact**
Heartland Impact
https://heartlandimpact.org/dairy/
1933 N Meacham Road, Suite 550
Schaumburg IL 60173
Phone: 312-377-4000
Email: contact@heartlandimpact.org
X: @HL_Impact

**Contact**
Consumers Defense
https://consumersdefense.com
Email: info@consumersdefense.com
X: @salnuzzo