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Federal Crop Insurance Corporation
U.S. Department of Agriculture

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RE: Expanding Access to Risk Protection (EARP), Docket ID FCIC-25-0068

The U.S. Canola Association (USCA) appreciates the opportunity to comment on the rule Expanding Access to Risk Protection (EARP) which implements provisions of H.R. 1 ([Pub. L. 119-21](#)), also known as the One Big Beautiful Bill Act (OBBBA). USCA supports most of the components of the EARP rule. However, we are concerned with the provisions to remove buy-up coverage on prevented planting. The USCA urges the Federal Crop Insurance Corporation (FCIC) to maintain this beneficial and effective option for growers.

Prevented plant is important to many growers, particularly in the northern region. It is regularly utilized by canola growers. There is no indication that the buy-up coverage on prevented planting is not meeting the FCIC standards for actuarial soundness and therefore the USCA sees no need for its elimination. If growers are using the option, paying the premium, and it is actuarially sound, we believe it should be maintained. Being prevented by weather from planting a crop can be the most damaging form of risk faced by a farmer. Once the planting window is missed, the crop year is lost. The prevented planting buy-up option is not a subsidy. Producers elect this coverage and pay additional premium for it. Eliminating the option removes a purchased layer of risk protection and replaces it with uncertainty.

The justification cited in the rule for removing the buy-up coverage option is that the risk has been addressed in the past by ad-hoc disaster assistance enacted by Congress. Such action by Congress cannot be guaranteed in the future and should not be relied upon as a risk management tool for growers.

The removal of this option is counter to the overarching purpose and the title of the rule, which is to expand access to risk protection. We urge FCIC to retain the option for growers to purchase buy-up coverage on prevented planting.

Sincerely,

Tim Mickelson
President