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RE: Using Corn and Soybean as cover crops on Prevented Planted acres in Wisconsin during 2020

To whom it may concern:

For a crop to be considered a cover crop RMA states that *"For crop insurance purposes, a cover crop is a crop generally recognized by agricultural experts as agronomically sound for the area for erosion control or other purposes related to conservation or soil improvement."* Soybean and corn both meet this requirement. However please remember that BMP's must be followed to meet this requirement. Every producer who declares Prevent Planting must get approval from his or her crop insurance agent before any Prevent Planting management plan is implemented.

Farmers taking the full prevented plant indemnity should note that they cannot ever harvest the cover crop for grain or seed. RMA rules allow, only after November 1, grazing and harvest as hay (for bedding or feed) and now for silage, haylage or baleage. If a farmer wants to harvest it as grain or seed, then they should declare it as an alternative crop and only collect the partial (35%) prevented plant indemnity."

Briefly the goal of a cover crop is to protect the soil from erosion (wind and water), to improve water quality by capturing nutrients, to build organic matter, and to suppress weeds. Agronomic guidance regarding the use of corn and soybean as a cover crop include:

CORN

Seed: Conventional hybrids and open-pollinated varieties are less expensive than bio-engineered hybrids. Neither seed nor grain from bio-engineered corn hybrids can be used as cover crop seed. Upon purchase of bio-engineered hybrids, farmers sign a contract that: 1) limits usage of grain to specific end product channels, 2) restricts ownership of bio-engineered traits, and 3) requires a refuge (stewardship). There has been some discussion of using the F2 (grain) of 2019 production ("bin-run" seed/grain). A 10-20% grain yield drag would be expected for F2 seed, however, little grain yield is expected anyway with July planting dates. Using bin-run grain as seed might be possible for conventional hybrids and open-pollinated varieties. Check seed labels and grower agreements to make sure. Again, it is illegal to use bio-engineered hybrids. For specifics about contracts for bio-engineered hybrids, see <https://www.agcelerate.com/Home>.

Performing any ONE of the following practices, if different from the current on-farm commercial production practice, indicates that the objective of growing corn for grain or silage has changed to to the objective of growing corn as a cover crop.

Plant population and seed costs: Higher populations lead to faster ground cover and helps with weed suppression. Minimum populations upwards of 35,000 plants/A are needed for corn grown as a cover crop. However, seed costs can be prohibitive for higher populations.

Narrow row spacing: Corn is a row crop. Using a narrower row corn planter (< 30-inches), twin-row planter, or a grain drill can lead to faster ground cover by the corn canopy and weed suppression. Criss-crossed rows can lead to quicker canopy cover.

Crop rotation: Rotating crops helps with interrupting pest cycles and promotes early growth and quicker canopy coverage. The choice of the cover crop this year should be based upon the subsequent crop intended next year. For example, if soybean is planned for the field next year then corn (or some grass crop) should be the cover crop this year.

Planting into residue: Seeding into fields with > 30% residue provides some ground cover between planting and canopy establishment.

Pesticides: Herbicides should be used to help with weed control. Use care about pre-grazing and/or pre-harvest restrictions after September 1.

Nitrogen: The most important nitrogen applied to corn is the first 40 to 60 lb N/A. Even this may not be needed if N credits can be taken. Reducing N rate would improve cost of production, especially since little grain is expected.

July plantings rarely result in corn grain production in Wisconsin. A killing frost usually occurs during September or early October. If grain is produced and kernels develop beyond the milk to dough (R3-R4) stage then the crop should be cut with a haybine.

SOYBEAN

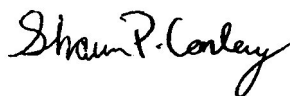
In a late planted, soybean cover crop situation, plant a minimum of 150,000 seeds per acre and strive to plant in narrow row spacings (<30 inches). This recommendation is intended to minimize soil erosion, maximize ground cover and weed suppression as well as provide adequate N fixation. I do however understand if a farm operation is limited by equipment restrictions (e.g. they only have a 30 inch row planter) I would not preclude them from being eligible to plant soybean as a cover crop. The next consideration is cost. Normally the cost of soybean seed to be used as a cover crop on a per acre basis would be cost prohibitive; however since soybean seed is usually not saved from year to year and treated seed is often devitalized it is often offered at a deep discount late in the year so shop around.

Sincerely,



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