

February 6, 2009

Judy Rude
Cooperative State Research, Education, and Extension Service
U.S. Department of Agriculture, Stop 2201
1400 Independence Avenue SW
Washington, D.C. 20250-2201

**Re: Institute CSREES-2008-0004
NSAC Response to Solicitation of Input from Stakeholders on the
Establishment of the National Institute of Food and Agriculture**

Dear Ms. Rude:

We are responding with these comments pursuant to the request for input (74 Fed. Reg. 71) related to the implementation of the National Institute of Food and Agriculture as required by the Food, Conservation, and Energy Act of 2008, including the draft guiding principles available on the CSREES website.

We have one major recommendation, namely that sustainable food and agricultural systems and sustainable development become the central organizing principle for NIFA. The draft principles are in our view inadequate. The third principle (“NIFA will address the public good”) should be the first principle. The public purposes for the taxpayer’s investment in agricultural research, education and extension should come before any of the other more process-oriented principles in the draft document. Discussion of approaches, leveraging, stakeholder input, accessibility and all the rest of the principles logically should come after a first principle that pertains to the pursuit of the public good. Moreover, the pursuit of the public good should strongly and explicitly be organized around dedication to pursuit of sustainable food and agriculture systems and more broadly, sustainable development. We therefore urge you to re-order the principles to lead with relevance, purpose, and goals, not process, and to make a far stronger statement than contained in the current draft about sustainability as the first guiding principle.

In the same vein, we would call attention to the fact that Congress chose to retain as the law of the land as the CSREES morphs into NIFA the very important statutory emphasis on sustainable agriculture. Subsection (k) of Section 2 of the Competitive, Special, and Facilities Research Grants Act of August 4, 1965 requires CSREES and now NIFA to ensure that competitive and special grants are consistent with the development of systems of sustainable agriculture.¹ It is our view and strong recommendation that NIFA dedicates itself to fulfilling this statutory requirement.

¹ (k) EMPHASIS ON SUSTAINABLE AGRICULTURE.—The Secretary of Agriculture shall ensure that grants made under subsections (b) and (c) are, where appropriate, consistent with the development of systems of sustainable agriculture. For purposes of this section, the term “sustainable agriculture” has the meaning given that term in section 1404 of the National Agricultural Research, Extension, and Teaching Policy Act of 1977 (7 U.S.C. 3103).

We would further note that existing statute spells out in more detail what the sustainable agriculture emphasis for competitive and special grants means. The National Agricultural Research, Extension, and Teaching Policy Act of 1977, at Section 1404, defines sustainable agriculture as follows:

“(19) The term “sustainable agriculture” means an integrated system of plant and animal production practices having a site-specific application that will, over the long-term—

- (A) satisfy human food and fiber needs;*
- (B) enhance environmental quality and the natural resource base upon which the agriculture economy depends;*
- (C) make the most efficient use of nonrenewable resources and on-farm resources and integrate, where appropriate, natural biological cycles and controls;*
- (D) sustain the economic viability of farm operations; and*
- (E) enhance the quality of life for farmers and society as a whole.”*

In addition, the meaning of sustainable agriculture is elaborated further in Section 1619 of Title XVI of the Food, Agriculture, Conservation, and Trade Act of 1990, in enumerating the purposes of sustainable agriculture research and education:

“(a) PURPOSE.—It is the purpose of this subtitle to encourage research designed to increase our knowledge concerning agricultural production systems that—

- (1) maintain and enhance the quality and productivity of the soil;*
- (2) conserve soil, water, energy, natural resources, and fish and wildlife habitat;*
- (3) maintain and enhance the quality of surface and ground water;*
- (4) protect the health and safety of persons involved in the food and farm system;*
- (5) promote the well being of animals; and*
- (6) increase employment opportunities in agriculture.”*

We believe the agency needs to dedicate itself to pursuit of sustainable agriculture, as required by law and demanded by the huge crises we face as a country and internationally. We further believe that sustainability as an organizing principle should be expanded beyond agriculture to also include the food system as a whole and to community and economic development. We urge the agency to put sustainability front and center as it makes the transition to NIFA, beginning with modification of the guiding principles, but more importantly in the actual implementation of NIFA and all of its programs and operations.

Thank you for considering our views.

Sincerely,

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