



National Sustainable Agriculture Coalition

March 22, 2012

Agriculture and Food Research Initiative
Institute of Food Production and Sustainability
National Institute of Food and Agriculture
U.S. Department of Agriculture, STOP 2220
1400 Independence Avenue, SW
Washington, DC 20250–2220

Re: NSAC Comments on AFRI FY13 RFA – Docket Number NIFA-2012-0004

Submitted via Email to: afri@nifa.usda.gov

The National Sustainable Agriculture Coalition (NSAC) is grateful for the opportunity to submit comments on the Fiscal Year 2013 Agriculture and Food Research Initiative (AFRI) Request for Applications (RFA). Additionally, these comments were presented as oral testimony at the February 22, 2012 stakeholder listening session hosted by the National Institute of Food and Agriculture in Washington, D.C.

The National Sustainable Agriculture Coalition is a national alliance of over 40 family farm, food, rural, and conservation organizations that together take common positions on federal agriculture and food policies to advance sustainable agriculture. Research, extension, and education are key issues for our coalition. In 2009, NSAC co-founded the AFRI Coalition, which now represents over 40 professional scientific societies and agricultural stakeholders. NSAC's research policy work focuses on the development, funding, and implementation of USDA and other federal research, education, extension, and integrated programs that examine sustainable food and agricultural systems, including the AFRI program.

NSAC applauds USDA's renewed commitment to outcomes-oriented research. In our view, AFRI must offer enhanced support to the development of sustainable food and agricultural systems in order to meet its goals. Therefore, NSAC makes the following recommendations on research priorities for the AFRI FY 2013 RFAs as well as on AFRI program administration. Our recommendations aim to further the goals of sustainability through AFRI and to support research with increased likelihood of delivering on the agency's desired outcomes.

Part I: Recommendations on Research Priorities for AFRI FY 2013 RFAs

1. Classical Breeding

AFRI should provide adequate resources and priority to research projects that lead to the release of farmer-ready public crop varieties and livestock breeds.

Despite the clear call from Congress for USDA to address our nation's classical plant and animal breeding needs, the AFRI RFAs released since the passage of the 2008 Farm Bill have fallen well short in addressing those needs. The FY11 RFA¹ took a small step in response to our call for more

attention to conventional plant and animal breeding by specifically including language that allows funding for conventional breeding but only in direct competition with genomics and biotechnology. This minor improvement falls far short of the congressional mandate for classical plant and animal breeding programs that include farmers and ranchers as participants and are provided with long-term grants necessary to conduct effective research and development of improved seeds and breeds for public release. Furthermore, this slight modification in the FY11 RFA did not result in increased funding of classical breeding projects.

In order to ensure that the congressional mandate for increased research and resources for classical plant and animal breeding is achieved, we recommend that:

- Five percent of total AFRI funding be dedicated to classical plant and animal breeding projects, unencumbered by mandatory requirements for genomics work, which is intended to lead to the release of farmer-ready public crop varieties and livestock breeds, with priority placed on regionally adapted breeds and varieties, and breeding for organic and sustainable farming systems, pest and disease resistance, and resilience to climate change; and
- AFRI review panels for these classical breeding programs include a majority of reviewers with strong demonstrated expertise and experience in classical breeding.

Priority for awarding competitive grants should be given to projects that:

- Include multi-disciplinary teams composed of public and/or private breeders, ARS researchers, farmers and ranchers, and non-governmental organizations;
- Create or reinvigorate Farmer-Breeder programs, including the targeting of resources and programmatic oversight for on-farm participatory breeding, germplasm screening and evaluation, by improving access to current germplasm collections for on-farm dynamic conservation by trained farmers; and
- Have as a primary goal ensuring the rapid availability of locally and regionally adapted public cultivar options and animal breeds for farmers and ranchers of each region of the country.

Finally, grant awards should also be made to individuals for projects of exceptional promise in developing local and regional plant cultivars and animal breeds suitable for organic and sustainable production systems.

Ongoing analysis and tracking of awards for classical breeding should be a priority for classical breeding grants to ensure that a diverse range of crop and animal breeding needs are being met in a timely and transparent manner.

2. Sustainable and Organic Farming Systems

There needs to be an expanded emphasis on organic and sustainable farming systems, within both the foundational and challenge grant areas.

The 2008 Farm Bill expressly mandated key foundational research areas for AFRI with priorities that support the development of sustainable farming and food systems, and although we like the idea of challenge areas, there needs to be a balance between the authorized foundational programs and the challenges. We therefore recommend that a minimum of 50 percent of AFRI funding be devoted to the foundational priorities established in the 2008 Farm Bill.

We also believe there needs to be an expanded emphasis within AFRI on organic and sustainable farming systems by:

- Requiring a minimum of 10 percent of AFRI funding be devoted to organic systems;
- Prioritizing projects that investigate the benefit of diversified crop rotations and integrated crop-livestock systems; and
- Renaming the Bioenergy Challenge Area to “Energy Conservation and Renewable Energy for Farms and Rural Communities” and expanding AFRI’s energy priorities beyond predominant biofuel crops to include research, extension, and education into second generation bioenergy crop production and processing to meet on-farm and local community needs, as well as energy conservation and solar and wind energy development on-farm and within rural communities.

3. Beginning Farmers and Ranchers

In response to the Secretary’s call to grow the next generation of farmers, we recommend that AFRI include an emphasis on the unique concerns related to beginning farmers and ranchers.

NIFA has previously acknowledged the importance of funding research that addresses the unique challenges of small and mid-sized producers by creating a priority area within the AFRI program. The same is needed to address the pressing concerns that beginning farmers face. This new priority area would be most appropriately located within the Agriculture Economic and Rural Communities program area and would include research projects that focus on:

- Developing new farmer training models;
- Assisting socially disadvantaged and immigrant farmers;
- Providing support for farm and land transition and farm transfer;
- Making rental land accessible as an entry option;
- Providing lower risk production start-up options;
- Examining alternative marketing and financing strategies;
- Enabling beginning farmer profitability; and
- Exploring farm viability strategies.

4. Economic Development through Local and Regional Agriculture

We support the emphasis in the past few AFRI RFAs on local and regional food systems research. Congress enabled the agency to make such awards through the AFRI priority on Agriculture Economics and Rural Communities, and we support continuing and expanding the call for projects related to the development and success of local and regional food systems.

Part II: Recommendations on AFRI Program Administration

5. Integration of Research, Education, and Extension Activities

We recommend that additional foundational programs within AFRI be opened up to include integrated research, education, and extension projects.

We applaud the inclusion of integrated projects in the Agriculture Economics and Rural Communities Program Area in the FY 2011 RFA, and feel there is a great need for integrated activities to stimulate entrepreneurship across rural America. We urge the agency to consider opening up other foundational program areas to integrated projects in future RFAs. The foundational programs are the ones authorized by Congress, and Congress clearly directed at least 30 percent (a minimum, not a maximum) of all awards, including foundational awards, be integrated. Moreover, whether in the foundational programs or in the challenge areas, the decision on whether to seek research only (or extension or education only) or integrated projects should be made on a case-by-case basis, based on the merits of the RFA category or subcategory and the related goals and not on an artificial line of demarcation.

6. Eligibility and Competition

We strongly recommend that NIFA take steps to ensure that the implementation and administration of AFRI complies with statutory language calling for a *diversity of eligible applicants* by requiring that each AFRI RFA be fully competitive and open to all applicants, and must include both integrated and single-function projects.

We object to the agency's neglect of Congress's intent to allow AFRI integrated project grants to be open to a wide array of entities, beyond universities and colleges. These include individuals, non-profit organizations, and other research institutions and organizations, as well as a combination of these entities.

The statute states the following (emphasis added):

Subsection (b) of the Competitive, Special, and Facilities Research Grant Act (7 U.S.C. 450i(b))

(4) GENERAL ADMINISTRATION.—In making grants under this subsection, the Secretary shall—

(E) in seeking proposals for grants under this subsection and in performing peer review evaluations of such proposals, **seek the widest participation of qualified individuals** in the Federal Government, colleges and universities, State agricultural experiment stations, and the private sector.

(7) ELIGIBLE ENTITIES.—The Secretary may make grants to carry out research, extension, and education under this subsection to—

(A) State agricultural experiment stations;

- (B) colleges and universities;
- (C) university research foundations;
- (D) other research institutions and organizations;
- (E) Federal agencies;
- (F) national laboratories;
- (G) private organizations or corporations;
- (H) individuals; or
- (I) any group consisting of 2 or more of entities described in subparagraphs (A) through (H)

The statute is crystal clear with respect to both the list of who is eligible for all grants under AFRI and is also clear in its specific directive that the agency seek the widest possible participation in the program.

We therefore strongly recommend that the agency take steps to ensure that the implementation and administration of AFRI complies with statutory language calling for a diversity of eligible applicants by requiring that **each AFRI RFA** be fully competitive and open to all applicants, and must include both integrated and single-function projects.

7. Smaller Grants for Innovative Projects

We recommend that AFRI grant programs award grants of all sizes, including smaller grants for innovative projects.

We agree that there is a need for multi-institutional, collaborative research projects that require a significant federal investment, in order to address significant challenges of pressing national concern. We also believe that smaller budget projects can stimulate the innovation and resourcefulness of some of our country's best problem solvers, including farmers themselves, smaller academic institutions, non-profit research organizations, and inquisitive researchers working on cutting edge research projects that address the needs of sustainable agriculture. We therefore recommend that both the major foundational priorities and the challenge areas within AFRI include small grants for innovative projects and that at least 40 percent of program funds be devoted to smaller projects that request \$1 million or less in funding per year.

8. Streamlined Application Process

We recommend that NIFA take steps to streamline the application process and reduce the administrative requirements for applicants with limited institutional capacity.

In addition to administrative limitations on eligibility, the grant application procedures for AFRI are clearly targeted to large-scale, multi-institutional grants, with nearly 300 pages needed to complete a grant proposal. This process discourages smaller eligible institutions and organizations from

submitting grant proposals for smaller projects that request less funding but could pay off with big results. We therefore recommend that NIFA take steps to streamline the application process and reduce the administrative requirements for applicants with limited institutional capacity, including non-profit organizations and on-farm researchers, to ensure that these groups are able to be successful in competing for federal research grants.

In closing, NSAC and our member groups across the country believe that there is much promise for research focused on sustainable agricultural systems through the AFRI program. We thank you for serious consideration of our recommendations, and would welcome any additional feedback we can provide.

Sincerely,

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ⁱ To date, the FY 2012 RFA for the Foundational Program within AFRI has not yet been released. We are therefore making recommendations based on the FY 2011 Foundational RFA.