



August 22, 2016

Policy and Oversight Division  
Office of Grants and Financial Management  
National Institute of Food and Agriculture  
USDA STOP 2299  
1400 Independence Avenue, SW  
Washington, DC 20250-2299

Submitted via e-mail [Policy@nifa.usda.gov](mailto:Policy@nifa.usda.gov)

**RE: Comments Responding to the 2016 Organic Agriculture Research and Extension Initiative Request for Applications**

On behalf of the National Sustainable Agriculture Coalition (NSAC), we are submitting recommendations in response to the solicitation for stakeholder input on the FY2016 Organic Agriculture Research and Extension Initiative (OREI) Request for Applications (RFA).

NSAC represents 46 family farm, rural development, conservation, and environmental organizations from around the United States that share a commitment to federal policy that promotes sustainable agriculture production systems, family-based farms and ranches, and healthy, and vibrant rural communities. A complete list of represented member organizations is included at the end of these recommendations (see page 8).

Research, extension, and education policies and programs are key issues for our coalition, and have been a core component of NSAC's policy work over the past 29 years. Our coalition's research policy focus includes organic research since some of our members operate within the organic sector and work with or represent organic farmers and other stakeholders – including organic certifiers and researchers.

Overall NSAC is pleased with the FY2016 OREI RFA, and we were especially pleased to see several of the recommendations we made for changes to the FY2015 RFA included for FY2016. We have several new recommendations that are outlined in the attached document. That we believe will further improve subsequent RFA's and strengthen the program as a whole.

We appreciate the opportunity to submit recommendations responding to the FY2016 OREI RFA. We would be happy to provide additional input or clarification if needed, and would welcome the opportunity to discuss these recommendations further. Thank you for considering our recommendations.

Sincerely,

Ferd Hoefner  
Policy Director

Paul Wolfe  
Policy Specialist

## EXISTING PROVISIONS RECOMMENDED FOR RETENTION

### **1. Retain the explicit reference to NGO's in the list of organizations that are strongly encouraged to apply. (Part IB)**

NSAC appreciates the inclusion of the “NGO’s that are engaged in organic agriculture research, education, and outreach” language as part of the list of organizations strongly encouraged to apply. This language clearly signals to applicants exempt from the matching funds requirement that they can partner with these types of organizations.

This is important especially in light of the 2014 Farm Bill’s matching funds requirement, which has likely exacerbated the already unbalanced nature of OREI awards in favor of land-grant and other exempt institutions. During the 2004-2015 funding cycles only 11 OREI awards have gone to organizations that are not either universities, colleges, or ARS. Of those 11, 9 went to NGOs, representing \$1.25 million or about 1 percent of total grant funding. The vast majority, 81 percent of OREI awards, representing 88 percent of funding, has gone to 1862 Land Grant Universities.

The strong RFA language also clearly signals to NGOs that they are eligible to apply for funding through OREI as the principal investigator. NGOs that engage in research, education, and outreach often have direct working relationships with organic producers and processors, which gives them a unique perspective on research needs of end users that can help ensure quality applications which translates into quality research and practical results.

### **2. Retain livestock-crop integration as a priority for organic animal production systems research. (Part IB Priority I)**

Research on organic animal production is critically important, and we support the inclusion of a reference to livestock-crop integration research in Priority I. Integrated livestock-crop systems have the potential to enhance soil and livestock health, maximize the efficiency of within-farm nutrient cycling, reduce the need to import nutrients and other off-farm inputs, and reduce manure- and nutrient-related threats to water quality. Thus, diversified crop-livestock systems can provide significant financial and environmental benefits to producers and surrounding communities. Additional research is needed to optimize management practices for organically managed, integrated crop-livestock production systems in different agro-ecoregions in the US. Extension and education components of OREI projects on this topic are also needed in order to disseminate key research findings to organic producers so those benefits may be fully realized.

### **3. Retain the priority on development and release of new public seed varieties that are well suited for organic production. (Part IB Priority 4)**

NSAC is greatly concerned with ensuring the availability of public seed varieties that are well suited for organic production in each of the major agricultural regions across the US. We appreciate OREI for including development of new public cultivars under the priority to “strengthen organic crop seed systems” priority, and for language clarifying that “projects dealing solely with cultivar evaluations do not fit under this priority.”

We believe that strengthening organic seed systems cannot be accomplished without public cultivar developers working to make more public varieties available that are well suited to organic production systems. OREI has provided an important source of support for university plant breeders working with farmers toward this vital goal, and NSAC looks forward to a continuation and expansion of this support.

**4. Retain the link to the National Organic Standards Board's (NOSB) research priorities in the RFA. (Part B)**

NSAC appreciates the increased emphasis on NOSB's research priorities in the FY16 RFA.

We believe that, in its capacity as an official advisor to USDA, NOSB's priorities should be fully integrated into OREI RFAs – as they align with the priorities outlined in statute. The most recent list was transmitted in [October 2015](#), and includes priorities such as whole farm systems, alternatives to antibiotics, preventative livestock health strategies, unintended introduction of genetically engineered material (GMO) into plant breeding lines and the fate of GMO material in compost.

**5. Retain Planning Grants as an eligible activity in order to ensure that non-profit organizations and limited resource organizations can develop quality and competitive proposals. (Part IIC (3))**

NSAC appreciated the return of Planning Grants to the FY2014 RFA, and their retention in each of the last two years. Planning Grants are important to our members because they allow limited resource organizations to develop well-organized projects and better applications for future RFAs. Planning Grants result in better developed research proposals, whether ultimately funded by OREI or through another source, which translates into better results for organic producers. The use of a planning grant to begin to address the emergence of the invasive exotic fruit pest Spotted Wing Drosophila is a good example of the proper use of a planning grant.

**6. Retain the requirement that projects include a data management plan that clearly describes how the data will be disseminated and accessible to the public. (Part II C)**

NSAC is committed to supporting the public dissemination of data and other information developed utilizing federal funding. The SARE program is an example of a research-focused program where data dissemination has been made a priority and has been a success. Our ultimate goal is to ensure the OREI retains a balance between research, extension, and education while also making sure OREI funded project results are made publically available.

**PURPOSE AND PRIORITIES RECOMMENDATION (PART IB)**

**1. Include additional explanatory language in the first priority to ensure clarity about what is meant by “advanced on-farm research and development.” (Part IB Priority 1)**

It is somewhat unclear if “advanced on-farm research and development” entails active engagement of host farmers in planning and conducting trials, collecting data, and evaluating outcomes or if

advanced on-farm research may be conducted by scientists, producers with scientist guidance, or producer-scientist teams.

Review of past projects seems to indicate that in a few cases, while farmers are mentioned, the actual projects do not engage the farmer in the R&D. It would be helpful to be explicit and provide clear options for farmer-scientist teams and for farmer research with scientist guidance. Appropriate language for these options could be borrowed from the SARE RFA's and adapted to OREI.

## **2. Retain priority four and continue to consider changes to address current organic seed needs. (Part IB Priority 4)**

We appreciate the inclusion of the cover crop breeding language in the FY2016 RFA and support its retention in future RFAs. To address the difficult tradeoff between soil health (minimum till, maximum biomass cover crops) and weed control and crop yield, we suggest inserting additional language in priority 4, as follows:

“Goals of organic seed systems proposals can include, but are not limited to: disease, weed, and pest resistance, stress tolerance, nutrient efficiency, performance in soil-improving and climate-friendly systems such as organic minimum-till, quality and yield improvement, and genetic mechanisms to prevent inadvertent introduction of GMO traits through cross-pollination.”

## **3. Retain priority five and make small changes to the priority to increase clarity about targeted technologies. (Part IB Priority 5)**

We appreciate the inclusion of the link to the National Organic Standards Board research priorities, and suggest the following change to priority 5 to increase clarity, as follows:

“Explore weed, crop pest, and disease management technology that meets the requirements of the National Organic Program (NOP\*) while ~~maintaining healthy water~~ protecting soil, water, and other resources”.

## **4. Modify Priorities six and seven to better reflect a systems-based approach to livestock production and reduce the emphasis on confinement and single animal type systems. (Part IB Priorities 6,7)**

NSAC included this request last year and we include it again this year to encourage a focus on pasture based and management intensive rotational grazing systems, multi-species grazing, and integrated crop and livestock systems rather than monoculture confinement systems. We appreciate the inclusion of the reference to “NOP confinement standards” to help ensure that research is consistent with the NOP animal welfare standards. However, NSAC views rotational grazing and integrated livestock and cropping systems as a gold standard for more sustainable production. While animal productivity and economic viability are important priorities, we are concerned that OREI could favor research into specialized confinement systems that are unsustainable and contrary to the spirit of the NOP.

## **5. Further seek to address the dearth of animal-related OREI funded projects, especially development of new public livestock and poultry breeds for organic systems. (Part IB Priority 7)**

During 2002-2014, only about 25 percent of OREI projects were related to livestock production systems, indicating that USDA funding devoted to organic livestock research lags somewhat behind the market share of organic animal products – dairy, meat, eggs, which accounted for 35 percent of organic sales in the 2014 NASS organic farming survey. In addition, no OREI projects conducted animal breeding for organic production systems, which continue to be a research need for the organic community.

NSAC realizes that there are very real barriers to livestock related research, especially breeding of livestock and poultry for organic systems. These barriers may include limited institutional capacity for livestock genetics and breeding research, and a perception that the amount of funding available through OREI cannot accommodate animal breeding as well as other top organic research priorities, both of which may contribute to a lack of livestock proposals. In addition, current language in Priority 7 (which first appeared in the 2011 RFA) does not *directly* invite livestock breeding proposals, yet there is a critical need for new or improved, publicly available livestock and poultry breeds that can thrive and perform in organic, pasture-based systems. This is a priority that has been identified as a farmer need and historically a shortfall in the OREI program given that only 25 percent of OREI and ORG projects relate to livestock production systems.

Eight OREI projects have included comparative evaluation of two or more livestock or poultry breeds in organic systems, but none of the projects funded between 2011-15 have addressed genotype evaluation or animal breeding. Livestock and poultry breeding for organic systems is a major priority identified by Organic Farming Research Foundation, and one that remains to be addressed through OREI.

We suggest modifying the priority as follows.

~~“Catalog and characterize and/or Breed, evaluate,~~ and select animal genotypes and breeds adapted to organic systems. This would include, but is not restricted to: identification of and selection for pest, parasite, and disease resistance; health and performance under organic pasture and feed regimens such as management intensive rotational grazing and multispecies grazing; and performance in small, mixed or innovative farming operations.”

## **6. Consider encouraging the engagement of producers in curriculum development. (Part IB Priority 8)**

We have previously suggested that the curriculum development priority be expanded to include development of curriculum for farmer trainings. This would have allowed further dissemination of research for practical use. We also recommend that the RFA encourage the engagement of farmers in curriculum development projects.

## **7. Create a new priority for policy or integrate policy into the existing priorities.**

As far as we can tell, OREI has funded only two full REE projects with a policy component (a 2004 Tufts University study of scientific basis of organic livestock standards, and a 2014 NGO-led study of risk and crop insurance policy in organic versus conventional farming). There have also been three policy related planning grants, but none received a full REE grant. We are concerned that

there may be no panelists engaged who have experience in policy, which may lead them to discount proposals that are policy focused because they will not undertake empirical research.

Policy is one of the eight legislatively defined goals of the program. Yet, policy is not mentioned at all in the priorities section of the RFA. We strongly urge that a place be found for policy within the priorities, either as its own priority or through reference to policy considerations within the existing priorities. We are concerned that if reviewers don't see that policy is included among the priorities that even though it is a legislatively defined goal they will discount these applications. We also strongly recommend that reviewers with policy experience be added to each review panel.

### **PROJECT TYPE RECOMMENDATION (PART IIC)**

#### **1. Retain the category system language that seeks to prevent bias toward large projects (Part IIC)**

We support the evolution of the tier system into a category system because it provides greater guidance about what the focus of each category of project should be and we appreciate the inclusion of language to address the concerns expressed last year about the percentage of projects historically funded in the multi-regional category. In fact, for 2015 there were no targeted projects funded. We look forward to seeing what the results of the language change will be for 2016 awards and hope that the new language will be included for the foreseeable future so that any trends in the types of projects funded can become apparent.

This year we suggest one additional change that may help make applications more focused so that they do not attempt take on too many tasks, which can make results less practical for organic producers.

“Multi-Regional, Regional, and Targeted proposals will (1) be reviewed together with no set aside amount for any of the proposal types but taking into account the cost efficacy, scientific merit, farmer relevancy, and relative scope of each project type to avoid bias toward large projects, ...”

#### **2. Consider a set aside for targeted projects if no target proposals are included as part of the FY2016 awards. (Part IIC1)**

We have previously suggested that a set aside for smaller project be considered. We are not currently making that request, as the language of the 2016 RFA was changed in attempt to address our concerns about the distribution of grants across the three types of integrated proposals. However, if no targeted proposals are funded in 2016, we ask that the set aside be reconsidered.

#### **3. Retain Conference Proposals but increase the clarity of what is required of a conference proposal. (Part IIC (2))**

Conferences are important to ensuring that research results are disseminated to farmers in a useful way. NSAC members find conference proposals very useful for disseminating research results to the organic community, which facilitates actual adoption. These grants serve an important function that is not available through other grant programs benefiting the organic community such as the Organic Transitions Program and the Specialty Crop Research Initiative.

Recent feedback from reviewers indicates that they have an expectation that a conference not be reliant on an OREI grant for a significant amount of a conference's cost and that they be "self-funded" and financially independent. This implies that OREI conference grants should only be applied for as an add-on to a conference. We disagree with this point of view. Moreover, there is nothing in the RFA (pages 19 and 28) that makes it clear to applicants that information pertaining to how much support the grant proposal is providing relative to the whole must be provided. The RFA focuses on relevancy, need, logistics, stakeholder involvement, and the agenda.

The RFA should more clearly outline what expectations there are for a conference proposal application, and should clearly state that no matching funds are required provided that the proposed conference can be effectively done within the proposal budget. Panelists should also receive clear instructions about what they should be looking for in a conference proposal, and not to disqualify a proposal simply because the applicant is relying solely or primarily on the OREI grant to fund the event.

### **COST SHARING OR MATCHING RECOMMENDATIONS (PART IIIB)**

#### **1. Continue to allow a project to be exempt from the matching funds requirement as long as an exempt organization is a collaborator or partner on the project.**

In general, we are concerned that the 2014 Farm Bill's matching funds requirement is exacerbating the already unbalanced nature of OREI awards. Only 11 awards in the history of OREI have gone to organizations that are not either universities, colleges, or ARS. Of those 11 only 9 went to NGO's – \$1.25 million, or less than 1 percent of funding). The vast majority, (81 percent) of OREI awards have gone to 1862 Land Grant Universities.

We encourage USDA to continue to seek ways to bring more parity to the OREI program.

We support the language included in the FY2016 RFA that exempts a project from the matching funds requirement if an exempt entity has substantial involvement in a project, regardless of whether the exempt organization is the lead entity or not. Allowing the exemption to apply in this manner is critical to ensuring that NGOs that work closely with the organic community are still able to lead a project under the OREI grant program.

#### **2. Do not alter the matching contribution requirements, and continue to allow matching funds to be provided through any combination of in-kind or direct funding.**

The 2014 Farm bill required that the match requirement be fulfilled by "funds, in-kind contributions, or a combination of both."<sup>1</sup> We believe that this language does not restrict the ability of the grantee to provide the match in any combination of funds or in-kind contributions. The status quo should be maintained as to the nature of the matching contribution.

---

<sup>1</sup> Agriculture Act of 2014 (P.L. 113-79) Section 7128(a) amend. The National Agriculture Research, Extension, and Teaching Policy Act of 1977 (7 U.S.C. 3101 et seq.)

**3. Ensure that the requirements for a matching funds waiver do not overly disadvantage non-exempt organizations applying for OREI grants.**

While the rules implementing the matching requirement included in the 2014 Farm bill do allow a non-exempt organization to be exempt from the matching requirement when an exempt organization is substantially part of the project, this option may not always be achievable for an NGO.

A second avenue to an exemption included in the 2014 Farm Bill allows projects to seek a waiver based on the project being consistent with the priorities established by the National Agriculture Research, Extension, Education, and Economics Advisory Board (NAREEEAB). The Board has not yet released a Research, Education, and Economic Action Plan for 2015 or 2016, hence we support the use of the Board's most recently released Action Plan. We also support continuing to interpret the Action Plan broadly and therefore including all of OREI within the matching funds waiver provision.

It is our hope that, by adopting all three of our matching grant recommendations, USDA will seek to ensure the ability of non-exempt organizations to continue to apply for and receive OREI grants.



## NSAC Represented Members

Agriculture and Land-Based Training Association – *Salinas, CA*  
Alternative Energy Resources Organization – *Helena, MT*  
CCOF – California Certified Organic Farmers – *Santa Cruz, CA*  
California FarmLink – *Santa Cruz, CA*  
C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture) – *Hereford, TX*  
Catholic Rural Life – *St Paul, MN*  
Center for Rural Affairs – *Lyons, NE*  
Clagett Farm/Chesapeake Bay Foundation – *Upper Marlboro, MD*  
Community Alliance with Family Farmers – *Davis, CA*  
Dakota Rural Action – *Brookings, SD*  
Delta Land and Community, Inc. – *Almyra, AR*  
Ecological Farming Association – *Soquel, CA*  
Farmer-Veteran Coalition – *Davis, CA*  
Food Corps – *Portland, OR*  
Florida Organic Growers – *Gainesville, FL*  
GrassWorks – *New Holstein, WI*  
Hmong National Development, Inc. – *St Paul, MN and Washington, DC*  
Illinois Stewardship Alliance – *Springfield, IL*  
Institute for Agriculture and Trade Policy – *Minneapolis, MN*  
Interfaith Sustainable Food Collaborative – *Sebastopol, CA*  
Iowa Natural Heritage Foundation – *Des Moines, IA*  
Izaak Walton League of America – *St. Paul, MN/Gaithersburg, MD*  
Kansas Rural Center – *Topeka, KS*  
The Kerr Center for Sustainable Agriculture – *Poteau, OK*  
Land Stewardship Project – *Minneapolis, MN*  
MAFO – *St Cloud, MN*  
Michael Fields Agricultural Institute – *East Troy, WI*  
Michigan Food & Farming Systems – MIFFS – *East Lansing, MI*  
Michigan Organic Food and Farm Alliance – *Lansing, MI*  
Midwest Organic and Sustainable Education Service – *Spring Valley, WI*  
Montana Organic Association – *Eureka, MT*  
The National Center for Appropriate Technology – *Butte, MT*  
National Hmong American Farmers – *Fresno, CA*  
Nebraska Sustainable Agriculture Society – *Ceresco, NE*  
Northeast Organic Dairy Producers Alliance – *Deerfield, MA*  
Northern Plains Sustainable Agriculture Society – *LaMoure, ND*  
Northwest Center for Alternatives to Pesticides – *Eugene, OR*  
Ohio Ecological Food & Farm Association – *Columbus, OH*  
Oregon Tilth – *Corvallis, OR*  
Organic Farming Research Foundation – *Santa Cruz, CA*  
Rural Advancement Foundation International USA – *Pittsboro, NC*  
Union of Concerned Scientists - Food and Environment Program – *Cambridge, MA; Washington, DC*  
Virginia Association for Biological Farming – *Lexington, VA*  
Wild Farm Alliance – *Watsonville, CA*  
Women, Food, and Agriculture Network – *Ames, IA*  
World Farmers – *Lancaster, MA*