



## National Sustainable Agriculture Coalition

September 17, 2014

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 2014 Organic Agriculture Research and Extension Initiative Request for Applications**

On behalf of the National Sustainable Agriculture Coalition (NSAC), we are submitting these recommendations in response to the solicitation for stakeholder input on the FY2014 Organic Agriculture Research and Extension Initiative (OREI) Request for Applications (RFA).

NSAC represents 40 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, vibrant rural communities. A complete list of represented member organizations is included at the end of these recommendations (see page 6).

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 25 years. Our coalition's research policy focus includes organic research since many of our members operate within the organic sector and work with or represent organic farmers and other stakeholders – including organic certifiers, and researchers. We welcome the restoration of funding for OREI since no funding was available in FY2013 and we appreciate that the 2014 RFA does not significantly deviate from previous RFAs.

Overall NSAC is pleased with the FY2014 OREI RFA, and as part of these recommendations we provide several examples of where the RFA includes provisions we would like to see retained in the future. We are also providing additional recommendations in three areas relating to the program's research priorities, project types, and cost sharing and matching funds requirements.

We appreciate the opportunity to submit recommendations responding to the FY2014 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 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 appreciates the return of Planning Grants to the FY2014 OREI RFA, after their absence from the last RFA. Planning Grants are important to our members because they allow limited resource organizations to develop well-organized projects and better applications for future RFA's. 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.

### **2. Retain Conference Proposals in order to support the stated extension emphasis, which is important to ensuring that research results are disseminated to farmers in a useful way. (Part IIC (2))**

Conference Proposals have been allowed for at least several years and NSAC members find them very useful for disseminating research results to the organic community. 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.

### **3. Retain the tiered system of grants to ensure that smaller grants are encouraged while also allowing a limited number of large-scale grants to be awarded. (Part IIC(1))**

The tiered system that is currently included in this year's RFA is important because it ensures that funding is available to support a diversity of projects – including those with very large and very small budgets. Tiering allows smaller projects to be funded while still making room for larger more complex projects. Since its inception, OREI has funded only eight Tier 1 grants while funding over one hundred Tier 2 grants. We feel that tiering helps maintain this ratio, which ensures that OREI has adequate funds to address the myriad of challenges facing the organic sector.

### **4. Retain the eligibility of Non-Governmental Organizations (NGOs), but also explicitly add NGO's to the list of eligible applicants. (Part IIIA)**

NSAC appreciates the continued eligibility of NGOs, as outlined in statute<sup>1</sup>, but suggests that they be explicitly added to the list of eligible organizations outlined in the RFA. This language would clearly signal to applicants exempt from the matching funds requirement that they can partner with these types of organizations [see page 5-6 for additional recommendations on the new matching funds requirement]. This clarification would also clearly signal 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 that can help ensure quality applications which translates into quality research and results.

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<sup>1</sup> 7 U.S.C. 5925b(b) Organic Agriculture Research and Extension Initiative, ref. 7 USC 450i(b)(4)(e) and (b)(7).

## **PURPOSE AND PRIORITIES RECOMMENDATIONS (PART IB)**

### **1. Prioritize the development of public seed varieties that are well suited for organic production.**

NSAC is greatly concerned with ensuring the availability of public seed varieties that are well suited for organic production and would like to see an emphasis on this within priority four. The current priority speaks of plant breeding and selection but does not extend the priority to include the goal of developing public seed varieties.

We believe that strengthening organic seed systems cannot be accomplished without the availability of more public varieties that are well suited to organic production systems.

### **2. Include livestock-crop integration as a priority for organic animal production systems research.**

Research on organic animal production is critically important, and we support the inclusion of priority six in the RFA. While the reference to a systems-based approach implies a holistic approach to livestock production, we would like to see an explicit reference to research on integrated crop-livestock systems within priority six. These 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. 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. Incorporate the National Organic Standards Board's (NOSB) research priorities into the RFA.**

We support the new priority placed on research that meets the requirements of the National Organic Program included in priority five of the FY2014 RFA, however we would suggest the addition of a specific reference to the NOSB's research priorities. Each year, NOSB recommends a list of organic research priorities to USDA, such as the most recent NOSB memo to USDA, transmitted on August 21, 2014, which included a variety of worthy research topics such as whole farm systems, poultry nutrition, preventative livestock health strategies, unintended introduction of genetically engineered material (GMO) into plant breeding lines and the fate of GMO material in compost.

As an official advisor to USDA, we believe NOSB's priorities should be fully integrated into future OREI RFAs – as they align with the priorities outlined in statute.

### **4. Retain and more fully integrate in the RFA the requirement that applicants consult with organic producers and/or processors to ensure that it is clear that the requirement applies to all the priorities in the RFA.**

After the list of priorities in Part IB, the RFA outlines the expectation that applicants consult with organic producers and/or processors, which NSAC supports. We also support the language included in the current RFA that indicates that additional points will be awarded for undertaking this

consultation. However, we would like to see this expectation given more prominence, perhaps by placing it before the priorities list, to ensure that applicants clearly understand the importance of consulting with the organic community in developing their proposal.

**5. Strengthen requirements for the participation and engagement of advisory panels to ensure they have a substantive role and that they are actually engaged during the entire length of the grant.**

NSAC strongly supports stakeholder involvement in OREI projects, which includes a local/regional advisory panel. Our concern is that the RFA's guidance as to the role of the panel and the requirements for monitoring the panel's activities are not adequate to ensure that the panels are active and effective. The panel should be required to be engaged throughout the entire life of the grant. We encourage the inclusion of more specific guidance on what is expected of the panel including specific requirements for in-person or teleconference meetings, as is already required for Project Directors. We also support retaining the ability of the panel to be compensated for their time and travel costs.

**6. Ensure that Non-Governmental Organizations (NGOs) continue to be eligible for this grant and encourage partnerships between NGOs and academic research institutions.**

In the Priorities section of the RFA, partnerships are encouraged, which we support. However, the section does not specifically mention NGOs. We would therefore recommend the addition of language encouraging partnerships with NGOs that are engaged in organic agriculture research, education, and outreach. These organizations often work directly with organic producers in the real world and can provide an important and unique perspective that helps improve the quality of applications and outreach to farmers, as well as the relevancy of that research to the organic community.

For example, the Beginning Farmer and Rancher Development Program RFA provides explicit priority to partnerships and collaborations that involve NGOs that have expertise working with beginning farmers and ranchers. OREI could give a similar priority to, or at the very least encourage, applicants that partner or collaborate with NGOs that have expertise within the organic sector.

**PROJECT TYPES RECOMMENDATION (PART IIC)**

**1. Retain the emphasis on applications that include a strong extension component to ensure that research results are shared with the organic community.**

Like conference grants, an emphasis on extension helps to ensure that research results are not put on a shelf and never shared with the organic community. With education activities now authorized within OREI under the new farm bill, we encourage NIFA to strive for an overall balance among research, extension, and education funded projects so that OREI effectively supports vital new research and timely delivery of research findings to the organic farming community in forms that support practical application.

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

While the matching funds requirement mandated by 2014 Farm Bill<sup>2</sup> does not apply to the FY2014 OREI RFA, we anticipate that it will be reflected in subsequent RFAs. We are therefore including recommendations regarding the implementation of the new matching funds requirement in anticipation of its inclusion in future RFAs.

In general, we are concerned about how the new matching funds requirement will impact non-exempt organizations that have previously been able to apply for a waiver specifically through the OREI program. We feel that the FY2014 RFA's matching funds requirement and waiver process that are in line with previous RFAs has proven to be flexible enough to ensure that non-academic and limited capacity institutions were not unfairly excluded from applying for grant funding through OREI. We therefore support retaining as many elements of the current system as possible in subsequent RFAs.

### **1. 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.**

We support the language included in the FY2014 SCRI Citrus Disease Research and Extension RFA that exempts a project from the matching funds requirement if an exempt entity has significant 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 as they have historically been successful in doing so in the past.

### **2. Include language encouraging exempt organizations to partner with NGOs that work directly with organic producers.**

With the new matching requirement outlined in the 2014 Farm Bill exempting most academic research institutions, we have concerns that the allocation of the awards under the OREI program could shift significantly to exclude non-profit and other non-exempt research institutions from successfully competing for grant funds.

We would therefore recommend that future OREI RFAs specifically encourage applicants to partner or collaborate with NGOs that have expertise in the organic sector, by including language similar to the language in the Beginning Farmer and Rancher Development Program RFA that provides priority to partnerships and collaborations that involve NGOs, that have expertise working with beginning farmers and ranchers.

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

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<sup>2</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.)

The 2014 Farm bill requires that the match requirement be fulfilled by “funds, in-kind contributions, or a combination of both.”<sup>3</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.

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

We support the current waiver authority within the FY14 OREI RFA and encourage USDA to continue to consider the capacity of applicants to meet the matching requirement when making decisions related to waiving the matching fund requirements.

The 2014 Farm Bill clearly authorizes the Secretary of Agriculture to waive the matching funds requirement for one year if the research or extension activities are consistent with the priorities established by the National Agriculture Research, Extension, Education, and Economics Advisory Board. It is our hope that within the confines of this requirement USDA seeks to ensure the ability of non-exempt organizations to continue to apply and receive OREI grants.

Thank you for your serious consideration of these recommendations as they relate to future Requests for Applications under the Organic Agriculture Research and Extension Initiative.

#### **NSAC Represented Members:**

Agriculture and Land-Based Training Association - Salinas, CA; Alternative Energy Resources Organization - Helena, MT; 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; 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; Fay-Penn Economic Development Council - Lemont Furnace, PA; Flats Mentor Farm - Lancaster, MA; 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; Iowa Natural Heritage Foundation - Des Moines, IA; Izaak Walton League of America - St. Paul, MN/Gaithersburg, MD; Kansas Rural Center - Whiting, KS; The Kerr Center for Sustainable Agriculture - Poteau, OK; Land Stewardship Project - Minneapolis, 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; National Catholic Rural Life Conference - Des Moines, IA; The National Center for Appropriate Technology - Butte, MT; 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; Organic

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<sup>3</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.)

Farming Research Foundation - Santa Cruz, CA; Rural Advancement Foundation International – USA - Pittsboro, NC; Union of Concerned Scientists Food and Environment Program - Cambridge, MA; Virginia Association for Biological Farming -Lexington, VA; Wild Farm Alliance -Watsonville, CA.