



November 19, 2014

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**Re: NSAC Comments on Specialty Crop Block Grant Program, Multi-State Project Competition, AMS–14–0073; TM–14–03**

The National Sustainable Agriculture Coalition (NSAC) welcomes the opportunity to submit comments on the guidance document, “Specialty Crop Block Grant Program, Multi-State Project Competition” (Guidance Document) which will be used to develop a Request for Applications (RFA).

NSAC is a national alliance of 40 family farm, food, rural, and conservation organizations<sup>1</sup> that together take common positions on federal agriculture and food policies to advance sustainable agriculture. NSAC has worked since its inception over 25 years ago to support specialty crop farmers and has supported and worked to reform the Specialty Crop Block Grant (SCBG) Program since before it was written into statute in 2008.

As a new component of the SCBG Program from the 2014 Farm Bill, and with food safety among the areas to be funded, the multi-state project competition represents an opportunity to make very timely and important strides to help farmers and local and regional food processors develop and follow food safety practices that will comply with the regulations the Food and Drug Administration is currently developing under the Food Safety Modernization Act (FSMA).

Having worked with its member organizations since 2009 on FSMA issues, NSAC understands that the complexity and magnitude of the impact of the FSMA rules will require dedicated resources for

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<sup>1</sup> Agriculture and Land Based Training Association, Alternative Energy Resources Organization, California Certified Organic Farmers, California FarmLink, C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture), Catholic Rural Life, Center for Rural Affairs, Clagett Farm/Chesapeake Bay Foundation, Community Alliance with Family Farmers, Dakota Rural Action, Delta Land and Community, Inc., Ecological Farming Association, Farmer-Veteran Coalition, Fay-Penn Economic Development Council, Flats Mentor Farm, Florida Organic Growers, Grassworks, Hmong National Development, Inc., Illinois Stewardship Alliance, Institute for Agriculture and Trade Policy, Iowa Natural Heritage Foundation, Izaak Walton League of America, Kansas Rural Center, Kerr Center for Sustainable Agriculture, Land Stewardship Project, Michael Fields Agricultural Institute, Michigan Integrated Farm and Food Systems, Michigan Organic Food and Farm Alliance, Midwest Organic and Sustainable Education Service, National Center for Appropriate Technology, National Sustainable Agriculture Coalition, Nebraska Sustainable Agriculture Society, Northeast Organic Dairy Producers Alliance, Northern Plains Sustainable Agriculture Society, Northwest Center for Alternatives to Pesticides, Ohio Ecological Food and Farm Association, Organic Farming Research Foundation, Rural Advancement Foundation International – USA, Union of Concerned Scientists Food and Environment Program, Virginia Association for Biological Farming, Wild Farm Alliance

effective implementation at the farm and food hub level. With that perspective in mind, we make the following recommendations.

**1. Dedicate half of the annual funding available for farmer food safety outreach, education, and training.**

A critical piece of ensuring a safe food supply and preventing food safety problems is helping farmers adapt to the new regulatory environment arising from the new FSMA rules, through outreach, training, and education. Although FSMA Section 209 authorized the establishment of a national food safety training, education, extension, outreach, and technical assistance program – now referred to by USDA as the Food Safety Outreach Program – this program was not allocated mandatory funding, but instead, like all provisions of FSMA, was granted an authorization for appropriations. What little discretionary funding the program may receive for FY 2015 is currently stalled in the Appropriations process and might very well not come to fruition. With no other viable options for funding farmer food safety training at this time, the Multi-State Project Competition (Multi-State) could fill this critical need, either as a supplement to a small appropriation or, in the worst case scenario, as the only funds available. Therefore, we recommend that half of the annual funding for the Multi-State be dedicated to food safety outreach and training for farmers and local and regional food processors.

By utilizing funding for the Multi-State in this way, the program can have a broad reach and impact. For example, with half of the \$3 million available from combined fiscal years 2014 and 2015 for the Multi-State, farmer-based organizations in multiple states could help thousands of farmers pass food safety audits. These organizations could use the funding toward activities such as hosting food safety workshops for farmers, assisting farmers with the development of food safety plans, and creating user-friendly food safety resources and materials. With each successive year following 2014, the impacts could be even greater, as the funding steps up by \$1 million each year.

Based on the experience of NSAC members who have received funding through SCBG to run food safety training programs, we know that it costs approximately \$300,000 over two years to train approximately 1,000 farmers to pass Good Agricultural Practices (GAPs)-type audits; \$50,000 to provide direct consulting services to 20 farms to write a food safety plan that gets them through a GAPs audit; and \$75,000 for one train-the-trainer effort.

Targeted funds toward food safety training are critical at this time. The FSMA rules are set to come into effect next year, and farmers who have previously been unregulated by FDA will find themselves covered by the rules, particularly specialty crop producers subject to the Produce Safety Rule. On-the-ground food safety outreach and training is the key to ensuring the effective implementation of the new FSMA rules. Without a federally-funded grants program dedicated to farmer outreach, training, and education, it will be difficult to provide the necessary understanding and assistance to producers to help them quickly come into compliance with and understand the requirements under the new rules.

This recommendation is also a very cost-effective proposal. Spreading the very small amount of money dedicated to multi-state projects across a wide variety of topics and regions of the country means very little will result in terms of real, measurable outcomes. We understand the pressures you are under to be all things to all people and to accede to a fully open process, even if that option accomplishes very little, but would urge you to focus at least half the funding available on this

critical need that is happening right now and for which this amount of funding could make a real difference. In addition, we would urge you to run this part of the program under the guidelines and with the same priorities as set out in Section 209 of FSMA.

**2. Fund projects that offer a range of food safety curriculum and materials, beyond that of the Produce Safety Alliance.**

Given the diversity of farmer and community-based organizations available to provide food safety trainings, and the unique needs of farmer populations in various states around the country, NSAC recommends a clarification to the statement in the Guidance document that requires education/training programs to align with and not duplicate curriculum and materials being developed by the Produce Safety Alliance (PSA).

Although we agree that materials should not duplicate those being developed by the PSA, neither should materials be restricted solely to those that follow and align with PSA. Such a restriction would prevent curriculum alternatives to PSA's materials from being developed that could best serve the unique needs of different farming communities.

PSA's curriculum approaches training through a classroom model. However, some of the most effective trainings happen in the field, using a direct consultation method. It is important to ensure that funding is available for a variety of training programs, and emphasizes those with the greatest on-the-ground impact. In addition, the limitation would be anti-competitive and would not only allow PSA a monopoly in developing curriculum and other materials, but would deter other organizations – academic, nongovernmental, and community-based – from providing farmers and farming organizations choices in determining which educational materials best suit their needs. Therefore, NSAC recommends clarification that a range of food safety projects can be funded, including projects that build upon or enhance existing training materials and curriculum, and that projects are not required to strictly adhere with the PSA curriculum.

**3. Partnerships between states and non-governmental and community-based organizations should be a mandatory requirement for the program.**

Although a State department of agriculture must serve as the lead for preparing and submitting a Multi-State application, as well as for administering the grant, USDA should make the following partnerships from the Guidance document (Section 3.5, Development of Proposals) a requirement for all applicants:

State departments of agriculture must also reach out to potential project partners to engage them in developing proposals that meet multi-state project priorities. These stakeholders should play an important role in the development of project goals and objectives, in implementing the project plan, and in evaluating and disseminating project results and outcomes.

AMS's recognition of the importance of partnerships should be reflected in the RFA so that applications must engage nongovernmental and community-based organizations with expertise in agricultural producer training and outreach as partners.

For the Multi-State RFA, AMS should adapt language found in the National Institute of Food and Agriculture's Request for Applications for the Beginning Farmer and Rancher Development Program, along these lines:

Applications are required to include nongovernmental organizations or community-based organizations with expertise in specialty crop agricultural producer training and outreach as partners or collaborators that contribute in a significant way to the project.

By requiring collaborations between state and nongovernmental organizations, projects can not only build meaningful working relationships but also reach and serve more specialty crop farmers and provide additional means of serving farmers with innovative solutions. With the relatively small pool of funding (compared with the Specialty Crop Block Grant Program) available in this Multi-State set-aside, partnerships can also help encourage more efficient use of funds.

In addition to the above recommendations with respect to food safety, we also offer these final recommendations for the program as a whole:

- 1. The RFA and the application evaluation system should provide substantial preference points for projects that target small and mid-sized family farms, as well as projects that focus on assistance to beginning, socially disadvantaged, and veteran farmers and ranchers.**
- 2. The RFA should encourage funded projects, where applicable, to provide translation or interpretation services to assist farmers who are limited in their English proficiency.**

Targeting the multi-state resources to focus assistance on historically underserved farmer populations will increase the program's benefits and help ensure assistance to all farmers. For guidance, the Multi-State program could look to RBCS' Value-Added Producer Grant program, which provides priority points for projects that increase opportunities for small and mid-sized family farms as well as for beginning, socially disadvantaged, and veteran farmers and ranchers. For those farmers for who English is not their first language, translation and interpretation services for materials, curriculum, or in-person trainings and workshops will be vital to helping them access programs, services, and educational opportunities from USDA and other agencies and organizations that can help them be successful in their farming operations.

We thank you for serious consideration of our recommendations, and would welcome your questions or additional comments.

Sincerely,



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