



January 14, 2016

Specialty Crop Multi-State Program
Grants Division, Agricultural Marketing Service
U.S. Department of Agriculture, STOP 0267
1400 Independence Avenue, SW
Washington, DC 20250–2220
ATTN: Janise Zygmunt

Re: Comments on FY 2015 Specialty Crop Multi-State Program RFA

Submitted via email to: janise.zygmunt@ams.usda.gov

The National Sustainable Agriculture Coalition (NSAC) appreciates the opportunity to submit comments on the Specialty Crop Multi-State Program (SCMP) Request for Applications (RFA) issued for Fiscal Year 2015.

NSAC is a national alliance of over 40 family farm, food, rural, and conservation organizations¹ that together take common positions on federal agriculture and food policies to advance sustainable agriculture. NSAC has worked for over 25 years to support specialty crop farmers and has worked to develop and reform the Specialty Crop Block Grant (SCBG) Program even before it was written into statute in 2008.

As a new component of the SCBG Program authorized under the 2014 Farm Bill, and with food safety among the priority 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

¹ 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; 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; 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; 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 – Sartell, 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; 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; Practical Farmers of Iowa – Ames, IA; 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.

processors develop and follow food safety practices that will comply with the regulations the Food and Drug Administration recently finalized under the Food Safety Modernization Act (FSMA).


In November, 2014 we submitted recommendations for the agency to consider prior to issuing the FY15 RFA, primarily focused on the valuable role that SCMP could play for specialty crop growers and local processors facing new regulatory and market food safety pressures. With those recommendations in mind, we submit the following comments on the FY15 RFA, and hope these comments can help streamline and enhance the program for FY16.

We thank you for your serious consideration of our recommendations, and would welcome requests for any additional feedback we can provide.

Sincerely,



Sophia Kruszewski, Policy Specialist
National Sustainable Agriculture Coalition



Wes King, Policy Specialist
National Sustainable Agriculture Coalition

I. COMMENTS REGARDING FOOD SAFETY CONSIDERATIONS

A. Integrate the additional guidance on Food Safety Projects into the FY16 RFA.

When the RFA was first released, we were very concerned by the language stating:

Training need not be restricted to the classroom. Training ‘in the field’ can be beneficial and effective. AMS will allow training conducted under a SCMP project to take place in alternate venues provided that it follows PSA or other FDA-recognized curriculum, materials and resources.

While we appreciate that training is not restricted to a classroom and that the agency recognized the benefits and effectiveness of on-farm training, we were concerned by the requirement that all trainings must follow “PSA or other FDA-recognized curriculum.” Given that there is currently only one FDA-recognized training for produce safety (the PSA), but FDA has indicated that it will be entering into cooperative agreements to develop alternative training programs – not to mention the significant need for general outreach and education on the rules – we believed this language to be unduly restrictive.

We were therefore quite relieved and pleased to see the subsequent clarification regarding Food Safety Projects, which clarified that proposals would be accepted for pre-training outreach/education activities, as well as proposals that involve alternative FDA-recognized training

(even though they are not yet available at the time of the application deadline) and proposals for GAPs, GMPs, and GHPs education and training. We remained concerned, however, that the language in the RFA would still discourage applicants. Therefore, to ensure that applicants are aware that a wider range of projects are possible than stated in the RFA, we recommend the agency integrate this clarifying guidance document into the RFA for FY16. As most farms have at least two – and many three or four – years to come into compliance with the new food safety rules, the need for food safety outreach, education, and training will continue to be critical in the years ahead.

Recommendation: Include the clarifying language from the food safety project guidance in the language of the RFA itself.

B. Dedicate half of the annual funding available for farmer food safety outreach, education, and training, or grant food safety projects additional priority points.

In our November 2014 comments, we recommended that the agency dedicate half of the annual funding to farmer food safety outreach, education, and training. Without justification, the agency declined to adopt this recommendation. We encourage the agency to reconsider this decision for FY 16, given the critical need for food safety education and training during these first few years of FSMA implementation.

A crucial component 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 administered by the National Institute for Food and Agriculture (NIFA) – this program was not allocated mandatory funding, but instead, like all provisions of FSMA, was granted an authorization for appropriations.

NIFA received a tiny fraction of what is needed to jump-start this program in FY 15 - \$2.5 million – and all of those funds went to the establishment of Regional Centers to coordinate food safety training projects – not to food safety training projects working directly with farmers. The FY 16 appropriations omnibus bill modestly increased this amount to \$5 million, but even this amount is severely below what is needed to help bring specialty crop growers into compliance with the new rules, and will likely result in many solid, beneficial food safety training projects going unfunded simply due to lack of funds. SCMP could fill this critical need. Therefore, we continue to urge that half of the annual funding for SCMP be dedicated to food safety outreach and training for farmers and local and regional food processors.

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.

Therefore, by utilizing SCMP funding in this way, the program can have a broad reach and impact. For example, with half of the \$3 million available for FY 16, 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, the impacts could be even greater, as the funding steps up by \$1 million each year.

Targeted funds toward food safety training are critical at this time, as 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. Though most farmers will not be required to be in compliance for another year or two, farmers are making decisions *now* about their businesses for future years. Moreover, market demand may move faster than the FSMA compliance timelines, requiring farmers to demonstrate compliance or pass audits prior to the time under which FDA expects them to be in compliance. On-the-ground food safety outreach and training is the key to ensuring the effective implementation of the new FSMA rules, and the ability of these producers to adapt to a changing market landscape. 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 federal and buyer-imposed 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.

If this option is not possible, we urge you to increase the number of priority points awarded to food safety projects in FY 16. Under the FY 15 RFA, projects that focused on food safety, plant pests and disease, research, crop-specific projects addressing common issues, and marketing and promotion were all eligible for five priority points. Given the pressing need for food safety training, we urge that food safety projects receive an additional two or three priority points commensurate with the pressing need for such projects.

Recommendation: Dedicate half the funds available through SCMP to food safety outreach, education, and training projects, or – if not possible – provide additional priority points to such food safety projects.

C. 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, we recommend AMS 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 Food Safety Outreach Program, which states:

All applicants must clearly demonstrate a significant partnership with community based organizations, non-governmental organizations and/or other local entities currently working with the target audiences, which may be accomplished through subcontracts to these groups. Significant partners must be actively involved in the development of educational materials and the implementation of training programs to include the identification, recruitment, and training of local trainers

The SCMP RFA could adopt the same or similar language, as follows:

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.

Recommendation: Add requirements to the application process that applicants must partner with community-based and nonprofit organizations that work directly with farmers and can provide expertise with food safety and specialty crop production.

II. COMMENTS REGARDING BEGINNING AND SOCIALLY DISADVANTAGED FARMERS, FAMILY FARMS, AND LOCAL/REGIONAL FOOD SYSTEMS

- A. The RFA and the application evaluation system should provide substantial priority 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.**

In our November 2014 comments, we recommended that the SCMP award priority points for projects that target assistance to beginning and socially disadvantaged farmers, small and mid-size family farms, and local and regional food systems. In the RFA, the agency acknowledges this recommendation, but declines to adopt it, without justification.

The agency does acknowledge – and we certainly appreciate – that such projects, including those targeting veterans and underserved communities, are encouraged and welcomed by USDA. This,

however, does provide meaningful support to ensure such projects are successfully funded.

We firmly believe that awarding priority points to such projects is in line with USDA's current priorities to better support historically underserved farmers, grow the numbers of beginning farmers, and protect the agency's investment in local and regional food systems.

Recommendation: In addition to encouraging the submission of projects that target beginning and socially disadvantaged farmers, family farms, and local and regional food systems, AMS should incentivize such projects through eligibility for priority points.

B. The RFA should encourage funded projects, where applicable, to provide translation or interpretation services to assist farmers who are limited in their English proficiency.

In our November 2014 comments, we urged the agency to include language in the RFA that encourages projects, where applicable, to provide translation or interpretation services to assist farmers with limited English proficiency. While the RFA does acknowledge that such services would be appropriate and allowed under SCMP as necessary to the project, it does not include such project types as those "Encouraged by USDA." In the FY16 RFA, we urge FDA to specifically list translation and interpretation services as a type of project that would be encouraged, given the benefit to historically underserved producers that may have limited English proficiency.

Recommendation: Include translation and interpretation services for specialty crop growers, handlers, or processors with limited English proficiency in the list of "Types of Projects Encouraged by USDA."