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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

**RE: Comments Responding to the 2015 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 FY2015 Organic Agriculture Research and Extension Initiative (OREI) Request for Applications (RFA).

NSAC represents 42 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 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.

Overall NSAC is pleased with the FY2015 OREI RFA, we were happy to see several of the recommendations we made for changes to the FY2014 RFA included for FY2015. We have a few new recommendations that are outlined in the attached document.

We appreciate the opportunity to submit recommendations responding to the FY2015 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,

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Ferd Hoefner Paul Wolfe

Policy Director 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 appreciated the return of Planning Grants to the FY2014 RFA, and their retention in FY2015.  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. 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.

**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 category system for integrated project grants but modify it to ensure that smaller grants are not squeezed out while also allowing a limited number of large-scale grants to be awarded. (Part IIC(1))**

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. However, we recommend that it be modified to ensure that smaller applications are not squeezed out.

If you apply the funding guidelines included in the new category system to all the OREI grants made between 2004 and 2012 nearly half (44%) were within or in excess of the amounts specified for multi-regional (largest) proposals. This shows a bias towards larger projects. We are not opposed to large projects, but believe strongly that the most meritorious projects should be funded, regardless of size.

The language in the RFA noting that “Multi-Regional, Regional, and Targeted proposals will be reviewed together with no set aside amount for any of the proposal types” is concerning because it could cause even more bias towards larger projects.

If accompanied by adequate instructions to reviewers, the category system for integrated project grants can help ensure that funding is available to support a diversity of projects – including those with very large and very small budgets. This can allow smaller projects to be funded while still making room for larger more complex projects.

To ensure that this is the case we recommend that mechanisms be adopted to ensure that projects with smaller budgets are fairly represented and not sidelined in favor of large projects. This could be accomplished in at least two ways. The first would be a set aside for each category of project. The second would be guidance or instructions to reviewers designed to avoid unintended bias toward large projects. For example, such bias could take the form of favoritism towards projects that utilize sophisticated “state of the art” research methods that are often farm more expensive than simpler methods that can provide equally valid and practical outcomes.

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

NSAC appreciates the addition of “NGO’s that are engaged in organic agriculture research, education, and outreach” to the list of entities 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 [see page 5-6 for additional recommendations on the matching funds requirement]. This addition 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 that can help ensure quality applications which translates into quality research and results.

**5. Retain the requirement that projects include a data management plan the clearly describes how the data will be disseminated and accessible to the public.**

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.

**6. Retain the Prioritize the development of 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 and we appreciate seeing the emphasis on publicly available releases within priority four. We also support the retention of the reference to cultivars under the same 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.

**7. 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. 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.

**8. Retain the link to the National Organic Standards Board’s (NOSB) research priorities in the RFA.**

Each year, NOSB recommends a list of organic research priorities to USDA, which includes a variety of worthy research topics. The most recent list was transmitted in August 2014, and included priorities 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 OREI RFAs – as they align with the priorities outlined in statute. It is our understanding that a new list of NOSB priorities is being developed for 2015. If the new priorities are issued in time, we recommend they be included in the next RFA.

**Purpose and Priorities Recommendation (Part IB)**

**1. We support the addition of “Projects dealing solely with cultivar evaluations do not fit under this priority” to priority 4. (Part IB Priority 4)**

NSAC is strongly supportive of the development of new publically available organic seed varieties. This provision could increase the incentive to include a substantive breeding and/or organic seed production component in an application. The organic community is in great need of new cultivars.

**2. Consider including language in the priorities section that prioritizes the development of new publicly available cultivars and that encourages applications from public cultivar developers.**

The number of public plant breeders in this country is shrinking and the OREI program should support, as much as possible, public cultivar developers. OREI should be a tool to increase the number of public cultivar developers, which will ensure that organic producers will have access to the seed best suited for their method of production.

**3. 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 wants to ensure that OREI supports research that is consistent with NOP standards and that supports sustainable agriculture, which includes integrated livestock and cropping systems. 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.

**4. Expand new curriculum priority to allow development of curriculum for farmers and other information consumers. (Part IB 8)**

This new priority seems to exclusively benefit land grant and non-land grant colleges of agriculture and other universities. While the 2014 farm bill did add education as a component of the OREI program, education does not appear in the legislatively defined goals of the program.

As noted in OREI’s eight legislatively defined goals included in the RFA, the programs focus is on practical research the benefits organic producers.

We do believe that expanding the availability of organic curriculum in higher education is an important goal given that organic education programs in the land-grant system are seriously lacking.

NSAC thus supports the retention of priority eight as long as it is expanded to include non-academic organizations that are developing curriculum for organic producers.

**Project Type 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. We encourage NIFA to strive for an overall balance among research, extension, and education 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.

**2. Curriculum Development Proposals (Part IIC (4))**

**See recommendation 4 above.**

**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 about how the 2014 Farm Bill’s matching funds requirement impacts non-exempt organizations that have previously been able to apply for a waiver through the OREI program.

We support the language included in the FY2015 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, as they have historically been successful in doing so.

**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.”[[1]](#footnote-1) 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.

**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 RFA identifies NAREEEAB’s 2014 Research, Education, and Economic Action Plan as the controlling document, which we support.

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.

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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, Salina, 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, Des Moines, IA; 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, Almyra, AR; Ecological Farming Association, Soquel, CA; Farmer-Veteran Coalition, Davis, CA; Flats Mentor Farm, Lancaster, PA; Florida Organic Growers, Gainesville, FL; GrassWorks, New Holstein, WI; Hmong National Development, St. Paul, MN; 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; Kansas Rural Center, Whiting, KS; Kerr Center for Sustainable Agriculture, Poteau, OK; Land Stewardship Project, Minneapolis, MN; MAFO, St. Cloud, MN; Michael Fields Agricultural Institute, East Troy, WI; Michigan Integrated Farm and Food Systems, East Lansing, MI; Michigan Organic Food and Farm Alliance, Lansing, MI: Midwest Organic and Sustainable Education Service, Spring Valley, WI; 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, Ohio Ecological Food and Farm Association, Oregon Tilth, Eugene, 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; Virginia Association for Biological Farming, Lexington, VA; Wild Farm Alliance, Watsonville, CA.

1. 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.) [↑](#footnote-ref-1)