



June 13, 2017

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

Submitted via e-mail Policy@nifa.usda.gov

RE: Comments Responding to the 2017 Organic Agriculture Research and Extension Initiative Request for Applications

On behalf of the National Sustainable Agriculture Coalition (NSAC) and the Organic Farming Research Foundation (OFRF), we are submitting the following recommendations in response to the solicitation for stakeholder input on the FY 2017 Organic Agriculture Research and Extension Initiative (OREI) Request for Applications (RFA).

NSAC represents 45 family farm, rural development, conservation, and environmental organizations that promote sustainable agriculture production systems. OFRF works to foster the improvement and adoption of organic farming systems by cultivating organic research, education, and federal policies. A complete list of represented NSAC member organizations is included at the end of these recommendations.

Research, extension, and education policies and programs are key issues for our coalition, and have been a core component of both NSAC and OFRF's policy work over the past 25 years. Our groups' 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, we are very pleased with the FY 2017 OREI RFA, and we were happy to see several of the recommendations we made for changes to the FY 2016 RFA included for FY 2017. We have a number of new recommendations for consideration as you prepare the FY 2018 RFA, as well as items included in this RFA that should remain in the FY2018 RFA, that are outlined in the attached document. We appreciate the opportunity to submit recommendations and would be happy to provide additional input or clarification if needed. We would welcome the opportunity to discuss these recommendations further.

Sincerely,

A handwritten signature in black ink that reads "Greg Fogel".

Greg Fogel
Policy Director, NSAC

A handwritten signature in black ink that reads "Kanika Gandhi".

Kanika Gandhi
Policy Specialist, NSAC

A handwritten signature in black ink that reads "Michael Stein".

Michael Stein
Policy Associate, OFRF

RECOMMENDATIONS FOR OVERALL RFA IMPROVEMENT

Retain livestock-crop integration as a priority for organic animal production systems research (pg. 5).

Research on organic animal production is critically important, and we support the inclusion of a reference to livestock-crop integration research in Priority 1. 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, extension, and education is needed to optimize management practices for organically managed, integrated crop-livestock production systems and to disseminate key research findings to organic producers so those benefits may be fully realized. Therefore, we recommend that NIFA make the following modification to Priority 6 of the RFA to include specific reference to livestock-crop integration (added language in bold, italicized, and underlined): “[...]including, but not limited to: grazing and pasture-based systems (including rotational grazing), ***livestock-crop integrated systems***, and NOP National Organic Standards Board (NOSB) confinement standards.”

Retain the 2017 language for Priority 7 (pg. 6), which begins: “Breed, evaluate, and select animal breeds and genotypes adapted to organic systems.”

In addition to crop-livestock integration, we want to thank NIFA for strengthening the language of Priority 7 to emphasize actual breeding and selection of new animal breeds for organic production systems. Research on organic animal production is critically important, and most modern livestock and poultry breeds are not well suited to pasture-based organic production systems. Therefore, additional research, extension, and education is needed to address challenges and disseminate key research findings to organic livestock and poultry producers.

In a recent analysis of OREI funded research conducted during 2004-2014 (OFRF, 2016), breeding livestock and poultry for organic systems emerged as a top priority and a major gap in research during that period. We were especially pleased to see the strengthened language for Priority 7 in the 2017 RFA, and also that the 2016 OREI awards included breeding dairy cattle for disease resistance (OREI 2016-0444, Penn State U), and working with producers to select sheep for resistance to gastro-intestinal nematode parasites (OREI 2016-04406, USDA ARS).

Within Priority 4 (pg. 5), “Strengthen organic crop seed systems,” retain the language “Prioritize the development of public seed varieties that are well suited for organic production.” Retain also the current list of specific breeding and selection objectives, including disease, weed, pest, and stress resistance; nutrient efficiency; performance in soil-improving and climate-friendly systems such as organic no-till; yield and quality; and exclusion of GMO cross pollination.

NSAC and OFRF are 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 4, as well as the current complete listing of desired traits and breeding goals. We believe that development of publicly available cultivars well suited to organic production systems in each of the major agricultural regions is essential for strengthening organic seed systems, and we

appreciate the quantity and quality of classical and farmer-participatory plant breeding work that OREI has funded to date.

Include a priority area specifically for projects related to policy.

OREI has eight legislatively-defined goals, one of which is identifying marketing and policy constraints to the expansion of organic agriculture. Additional research is needed to identify and address the policy related and market constraints to the expansion of organic agriculture within the United States. Between 2004 and 2016, only two OREI awards included a strong policy component: a comparison of organic certification standards for livestock in the U.S. and other countries (OREI 2004-05216, Tufts U.), and a comparative analysis of risk in organic versus conventional farming with a focus on crop insurance policy and programs (OREI 2014-05324, National Center for Appropriate Technology).

These funding trends are apparent despite the fact that policy is included as one of the eight legislatively defined goals of the program. Currently, policy is not mentioned at all in the priorities section of the RFA. We suggest that a place be found for policy within the priorities, either as its own priority or through a reference within the existing priorities. We are concerned that if policy is not included among the annual RFA priorities, 1) policy proposals will not be submitted, and 2) if proposals are submitted, reviewers may give insufficient weight to the policy components of research and extension activities proposed, which would be contradictory to the legislatively mandated priorities.

Encourage proposals for projects that focus on strengthening organic cropping systems, including: organic soils, weed management, fertility and nutrient management, and insect management. We recommend expanding Priority 5 as follows in order to place pest, weed, and disease management in this wider context (added text in bold, italics, and underlined): “Explore technologies that meet the requirements of the National Organic Program (NOP) while protecting soil, water, and other resources, and strengthening organic cropping systems through improved management of soils, nutrients, crops, weeds, pests, and diseases.”

We appreciate the current language in Priority 5 that emphasizes “systems based pest management.” One of the principles of organic production, clearly stated in NOP standards, is that organic pest, weed, and disease management must be addressed from a holistic perspective that includes soil health, biodiversity, and cropping system management, including cover crops and crop rotations. The suggested modification to Priority 5 language aims to embrace this wider perspective.

Because soil health plays such a central role in organic production systems, we encourage NIFA to include soil health explicitly in the FY 2018 RFA priorities. We appreciate the current language on plant breeding for adaptation to “soil improving systems” (Priority 4) and “protecting soil ... and other resources” in organic pest management (Priority 5). In addition, we recommend adding the following statement to Priority 1: “Research and development of practical information and tools that help producers monitor and build soil health and fertility in organic systems contributes substantially to this priority.”

Federal organic standards require producers to maintain or improve soil organic matter content and the physical, chemical, and biological condition of the soil. Specific research is needed on the interactions between soil health, soil quality, and nutrient management, including but not limited to:

defining soil health criteria, soil health and quality measurement, the relationship between soil health and organic management practices, building soil fertility, and enhancing yields. This should include, but not be limited to research into agroecological and systems approaches, and should lead to practical tools, information, and guidelines that farmers and ranchers can use to estimate and improve the health of their soils.

Retain language in Priority 5 stating that NOP-compatible technologies should also protect soil, water, and other resources (pg 6).

We appreciate the language that ensures the protection of soil, water, and other resources as an essential component of technologies that meet NOP requirements. The NOP rules include provisions for conservation of soil, water, wildlife, woodland, wetland, and other resources, and NOP compliance is now placing greater emphasis on conservation. OREI funded research that helps producers meet this requirement should be a high priority.

Retain the explicit reference to NGO's in the list of organizations that are strongly encouraged to apply (pg 7), and retain the provision that applies the exemption from matching funds requirements to all applicants that include a university or other exempt institution as a substantial project partner (pg 13-15).

In general, we are concerned that the 2014 Farm Bill's matching funds requirement is exacerbating the already unbalanced distribution of OREI awards. Of the 160 OREI awards between 2004 and 2016, 130 (81 percent) went to 1862 Land Grant Universities, 14 (9 percent) went to USDA ARS, 10 (6 percent) to NGOs, and the remaining 6 (4 percent) to other entities. Because the majority of awards to NGOs were small (\$40,000 – \$100,000) awards primarily to support conference, planning, or analytical projects, the proportion of total OREI funding awarded to NGOs is only about 1 percent. We realize that many of the LGU awards included NGOs as partners, and that participation of NGOs in the program may be more substantial than these figures suggest. However, we believe that NGOs and smaller educational institutions can and should also play a lead role as the funded entity in OREI projects moving forward, as many NGOs connect farmers with researchers, which allows for more applied projects that work to address farm-specific needs. While we are glad to see language in the 2017 RFA “strongly encouraging” such entities to apply, NIFA should undertake dedicated outreach efforts to encourage NGOs to apply and to actively encourage LGU applicants to consider partnering with NGOs on grant applications.

Retain the category system language that seeks to prevent bias toward large projects (pg 9-10).

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 projects should be. In addition, we appreciate the inclusion of language to address our concerns about a potential bias toward larger projects, based on the percentage of projects historically funded in the multi-regional category. While large projects can address research issues at a systems level, our analysis of OREI funded projects to date (OFRE, 2016) also illustrated the efficacy of smaller, more focused projects that do not attempt to take on too many tasks at once in delivering practical outcomes for organic producers.

We suggest one additional change to the language on page 10 of the RFA that may help reviewers more effectively weigh the merits of small and large projects and avoid unconscious bias toward the latter (suggested new language underlined in bold and italics):

“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, ...”

Due to the regionally specific nature of organic agriculture, we encourage NIFA to invite and fund proposals that address regionally specific production needs. We recommend an additional paragraph on (pg 6-7) encouraging these research applications, and/or specific reference to region-specific adaptations under the Targeted Proposals category (pg 10).

Given how diverse the range of applicants are in terms of geographic needs, as well as the many microclimates that exist across the country, this can help create solutions that could be more impactful. Regional solutions developed to address regionally-specific farmer needs provide an opportunity for smaller, targeted proposals that utilize simpler methods to reach clearly defined goals. Such smaller, regional projects can lead effectively to farmer-ready applications.

Retain the link to the National Organic Standards Board’s (NOSB) research priorities in the RFA (pg 6).

NSAC appreciates the increased emphasis on NOSB’s research priorities in the FY16 RFA, including the link to NOSB research priorities documents, which should be updated annually to include the latest statement (currently November, 2016).

As NOSB serves 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. The most recent priorities include: whole farm agroecological systems approach to organic agricultural research in general; alternatives to antibiotics and parasiticides, including livestock breed resistance to parasites and pathogens; alternatives to synthetic methionine for poultry and swine; and preventative livestock health strategies (NOSB, 2016). Organic crop production priorities include bio-based biodegradable plastic film mulches, organic no-till, plant disease management including alternatives to copper and breeding for disease resistance, alternatives to antibiotics for fire blight in tree fruit, prevention of unintended introduction of genetically engineered material (GMO) into plant breeding lines, and the fate of GMO material in compost.

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 (pg 10).

NSAC members find conference proposals very useful for disseminating research results to the broader 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 (ORG) and the Specialty Crop Research Initiative. During its review of OREI and ORG, the Organic Farming Research Foundation identified a number of OREI funded conferences and symposia that provided producers, researchers, and other agricultural professionals with unique networking opportunities, as well as delivering valuable practical outcomes of other OREI funded research to producers (OFRF, 2016).

References

NOSB, 2016. Research Priorities Identified at the November, 2016 meeting of the National Organic Standards Board.

<https://www.ams.usda.gov/sites/default/files/media/MS2016ResearchPriorities.pdf>.

OFRF, 2016. *Taking Stock: Analyzing and Reporting Organic Research Investments, 2002-2014*. Organic Farming Research Foundation Final Report, OREI Project 2014-05348. 220 pp. Available at <http://ofrf.org/taking-stock-analyzing-and-reporting-organic-research-investments-2002-2014>.

NSAC Represented Members

Agriculture and Land-Based Training Association - Salinas, CA

Alternative Energy Resources Organization - Helena, MT

CCOF - 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 - 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

Florida Organic Growers - Gainesville, FL

FoodCorps - Portland, OR

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
Organic Seed Alliance - Port Townsend, WA
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
Women, Food, and Agriculture Network - Ames, IA
World Farmers - Lancaster, MA