September 28, 2018

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 in Response to the 2018 Organic Agriculture Research and Extension Initiative Request for Applications

On behalf of the Organic Farming Research Foundation (OFRF) and the National Sustainable Agriculture Coalition (NSAC), we are submitting the following recommendations in response to the solicitation for stakeholder input on the FY 2018 Organic Agriculture Research and Extension Initiative (OREI) Request for Applications (RFA).

OFRF works to foster the improvement and adoption of organic farming systems by cultivating organic research, education, and federal policies. NSAC represents 48 family farm, rural development, conservation, and environmental organizations that promote sustainable agriculture production systems. 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 30 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 2018 OREI RFA, and we were happy to see several of the recommendations we made for changes to the FY 2017 RFA included in FY 2018. We have a number of new recommendations for consideration as you prepare the FY 2019 RFA, as well as items included in the FY 2018 RFA that we encourage you to retain in upcoming RFAs.

Given the current status of the Farm Bill, we are hopeful that you will be able to release an OREI FY 2019 RFA in a timely manner, as OREI research is vital to ensuring that farmers have the tools to address and overcome challenges. We would strongly urge USDA to do everything possible to avoid a gap in annual funding through OREI. As national stakeholders based in Washington D.C., we hope to continuing our strong working with NIFA staff in Washington, D.C. as we work together to support outstanding organic research, education, and extension around the country.

Please let us know if you would like additional input or clarification on our recommendations. We welcome the opportunity to discuss these recommendations with you in person.

Sincerely,

Michael Stein
Policy Associate, OFRF

Juli Obudzinski
Deputy Policy Director, NSAC

RECOMMENDATIONS FOR OVERALL RFA IMPROVEMENT

1. Retain the development and demonstration of educational tools as a priority, as well as the priority for the development of curriculum in organic agriculture.

USDA research programs have helped farmers and ranchers across the country to improve their effectiveness, efficiency, and sustainability. However, it is vital that Cooperative Extension and other professionals have the tools and opportunities to provide the education and extension necessary to ensure that research gets into the hands of end-users. Research, education, and extension can help farmers optimize management practices. Therefore, we urge the retention of priority 2, as an important component to help foster sound organic management practices. Additionally, undergraduate and /or graduate curriculum in organic agriculture can help train the next generation of organic farmers and researchers. We support the development of organic agriculture curricula outlined in priority 8 as a continued OREI priority.

2. Retain animal agriculture research and livestock-crop integration as a priority for organic systems research.

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.

Additionally, thank you for including robust language in priority 6 for systems-based animal production, health, and management for grazing and pasture-based systems, livestock-crop integrated systems, and NOP National Organic Standards Board (NOSB) confinement standards. We also appreciate the continued emphasis on evaluation and selection of animal breeds and genotypes for adapted for organic systems as outlined in priority 7.

3. Retain the priorities that support organic crop seed systems and breeding for organic productions.

NSAC and OFRF greatly appreciate the quantity and quality of classical and farmer-participatory breeding work that OREI has funded to date. We request continued emphasis on 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 agricultural systems. We urge the retention of language that prioritizes the development of public seed varieties that are well suited for organic production, as well as 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; improvement of yield and quality; and prevention of GMO cross pollination.

4. Retain the new priority on marketing, policy, and other socioeconomic barriers to the expansion of organic agriculture as a priority area.

Identifying marketing, policy, and socioeconomic constraints to the expansion of organic agriculture in the United States is an important area that requires additional research. Given the serious concerns over organic integrity and potential fraudulent organic imports, it is important for the organic community to understand the market, policy, and socioeconomic issues at play both domestically and internationally in the organic sector. Additional research into these areas can help ensure the integrity of organics as well as support the expansion of organic agriculture domestically.

5. Include a priority area specifically for projects related to science that protects organic integrity.

Given OREI's legislative goal 4 "exploring international trade opportunities for organically grown and processed agricultural commodities", and the concerns over integrity within the organic supply chain, additional research into preserving the integrity of organic products and detecting practices or procedures not approved for USDA organic production is needed.

The global organic market has been on a steady rise for more than two decades, and is now an almost $90 billion market. The American organic market alone accounts for close to $50 billion, with organic imports into the United States in 2017 up nearly 25 percent from the previous year. In the past year, however, investigations have revealed imported products fraudulently labeled as organic and gaps in the complex organic supply chain.

In addition to marketing, policy, and socioeconomic research into this area, there is a need for additional research into tools and testing methodologies that can protect organic integrity. This can include research into the type of testing needed for prohibited substances/practices, including pesticides, fumigants, genetic engineering, contaminant metals, antibiotic residues, etc. The veracity and efficacy of specific tests also needs additional research. With the ever-present concerns surrounding organic fraud, research into testing mechanisms could include research into carbon isotope to indicate global origin, validating biologically fixed nitrogen supplies in organic crops. These and other experimental testing tools could be researched for efficacy and efficiency.

Overall, we urge additional research in a variety of ways that can protect the overall integrity of organics.

6. Thank you for the continued emphasis on collaboration between research entities.

Please continue to strongly encourage applicants to develop partnerships that include collaborations with: small- or mid-sized accredited colleges and universities; 1890 Land-Grant Institutions, 1994 Land-Grant Institutions, Hispanic-serving institutions, and/or other institutions that serve high-risk, under-served, or hard-to-reach audiences, as well as non-profit organizations.

Please continue to retain the explicit reference to NGO's in the list of organizations that are strongly encouraged to apply 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.

7. Retain the category system language that promotes multi-regional, regional, and targeted projects.

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 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 and are very important, we also encourage focused projects that address regional or targeted challenges that deliver practical outcomes for organic producers.

8. Convene a Project Directors Meeting annually and coordinate location to coincide with organic conferences.

In addition to the research funded by OREI each year and the innovations and advancements in organic agriculture that result, another valuable component of OREI is the professional network that has been established and is fostered through OREI grantees. The project directors meeting is an invaluable space for researchers to not only gather and present research findings, but also to share best practices and foster collaboration within the organic research community. Rather than holding the meeting in Washington, DC, we recommend that NIFA coordinate the timing and location for the annual Project Directors meeting to coincide with annual organic farming or research conferences each year. These may include: Midwest Organic Farming Conference (MOSES), EcoFarm, Organicology, Northeast Organic Farming Association, Georgia Organics, Ohio Ecological Food and Farming Association, Organic Confluences, and the Organic Seed Growers Conference.

9. Release the FY 2019 Request for Applications as soon as possible.

In addition to the priorities listed above, we would encourage NIFA to move forward as quickly as possible with releasing a Request for Applications (RFA) for FY 2019, once additional funding is made available. We understand that NIFA is unable to issue the FY2019 RFA until either a new farm bill is signed into law or OREI's authority and funding is extended temporarily. However, we would urge the agency to take whatever steps might be needed to ensure the agency is prepared to move forward quickly with issuing an RFA for FY19 as soon as possible. This would be our strong preference, rather than to pool funding from FY19 with FY20 funds and make available through a single, multiyear RFA.

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/Chesapeake Bay Foundation Upper Marlboro, MD
Community Alliance with Family Farmers Davis, CA
Community Involved in Sustaining Agriculture South Deerfield, MA
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, 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 Center for Frontier Communities Silver City, NM
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