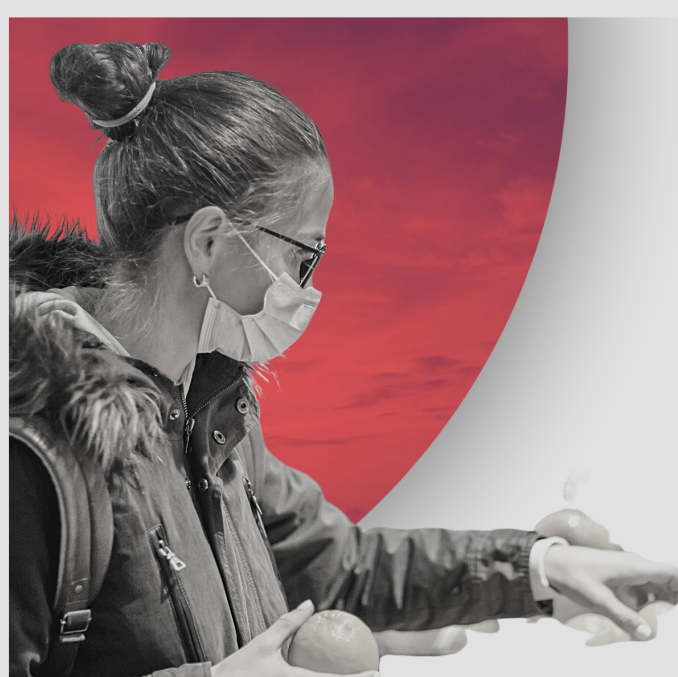


PRESIDENTIAL TRANSITION BRIEFING PAPERS:

FOOD & AGRICULTURE PRIORITIES FOR ADMINISTRATIVE ACTION



2020





**Presidential Transition Briefing Papers:
Food and Agriculture Priorities for Administrative Action
November 2020**

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INTRODUCTION

Founded in 1988, the National Sustainable Agriculture Coalition (NSAC) is an alliance of grassroots organizations that advocates for federal policy reform to advance the sustainability of agriculture, food systems, natural resources, and rural communities. NSAC's vision of agriculture is one where a safe, nutritious, ample, and affordable food supply is produced by a legion of family farmers who make a decent living from their labor, while protecting the environment, and contributing to the strength and stability of their communities.

NSAC's 130 member groups advance common positions to support small and mid-size family farms, protect natural resources, promote healthy rural communities, and ensure access to safe, nutritious, affordable food by everyone, in their own communities.

To do this work, NSAC:

- gathers input from sustainable and organic farmers and ranchers, and from a diverse group of grassroots farm, food, rural, and conservation organizations that work directly with farmers;
- develops policy through participatory issue committees that involve NSAC member organizations and Affiliated Regional Programs;
- provides direct representation in Washington, D.C. on behalf of its membership to members of Congress and federal administrative offices, such as USDA, FDA, and EPA; and
- builds the power of the sustainable agriculture movement by strengthening the capacity of its member groups to promote citizen engagement in the policy process.

For more than 30 years, NSAC has gathered input on food and agricultural issues from sustainable food and farming groups from around the country to present to incoming Administrations. It is the hope of NSAC and its member organizations that the new Administration will use these recommendations as they chart a new course in agriculture, one that centers on:

- A just, resilient, local/regional food system that supports and values the work of the people that make safe, nutritious, and affordable food available to everyone, in their own communities.
- A commitment to racial equity in program design, program administration, in the staffing at USDA, and in who is consulted about decisions that affect farmers and producers.
- The urgency of the climate crisis and need for an integrated response that engages and empowers farmers and recognizes the link between racial justice and climate impacts, as well as the complementary roles of conservation, research, risk management, and rural development programs in building community resilience to climate change, coronavirus, and other crises.

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- The need for greater USDA aid for communities affected by the coronavirus pandemic and that also helps farmers build new markets and feed members of their own communities.

This document has five primary sections relating to: resilient food systems, fair markets and competition, climate and farm conservation programs, food safety and supply chains, and agricultural research. All primary sections begin with "Centering Racial Equity in Program Design and Implementation" that list specific, equity focused provisions to elevate these recommendations for this new Administration. Each section is further organized into themes which may contain specific programs. Sections begin with explanatory text, include a bulleted list of recommendations in priority order, and often end with budgetary or funding requests.

HOW TO BUILD BACK BETTER

While our current food system has been lauded for its singular focus on producing the most safe, abundant, and affordable food supply, the ongoing pandemic has exposed its inherent vulnerabilities and unsustainability. At this critical moment in our nation's history, as we seek to rebuild our country and our food system, we have a unique opportunity to begin to address longstanding issues that have plagued our nation's health, our environment, and our rural communities.

The *Biden-Harris Plan To Build Back Better (BBB) in Rural America* is ambitious in breadth and scope and seeks to address many of the persistent issues that have challenged rural communities for decades. It heartens us all to see a comprehensive plan that integrates solutions on job creation and support for rural families, investments in Main Street economic development, renewed commitments to public institutions and education, a promise to advance racial equity and tear down structural racism in food systems, and an ironclad commitment to 'build a bright future for rural communities by investing in the next generation of agriculture and conservation.'

In support of these goals, the 130 member organizations of the National Sustainable Agriculture Coalition (NSAC) have developed a series of policy recommendations for the members of the Biden-Harris Transition Team in the hope that it will inform them as they consider how best to prioritize and realize these goals through concrete policy and administrative action within the first 100 days (and beyond) of the next Administration.

We hope that this document will begin an ongoing dialogue that will bring together members of the Biden-Harris Administration and our Coalition where shared goals and ideals can guide our collective work to build a more just and resilient food and agriculture system that is better equipped to confront the challenges facing our nation.

Centering Racial Equity in Program Design and Implementation

“ADVANCE RACIAL EQUITY IN RURAL AMERICA: Biden will pursue a dedicated agenda to close racial wealth gaps – including for rural Americans of color. One key way in which Biden will advance racial economic equity in rural America is by addressing longstanding inequities in agriculture. Black, Brown, and Native farmers have long faced barriers to growing their agricultural businesses, including unfair prices, unequal access to government support, retaliation for civil rights complaints, and outright injustice. For more than 100 years the USDA did little to alleviate the burdens of systemic inequality for Black, Brown and Native farmers and was often the site of injustice....As President, Biden will build upon the historic progress made during the Obama-Biden administration, taking additional steps to support the rights of Black, Brown and Native farmers.”

– Biden-Harris Plan to Build Back Better

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It is well understood that Black, Indigenous, and People of Color (BIPOC) have been at the heart of sustainable agriculture throughout history although their wisdom and leadership has seldom been recognized or acknowledged. The Biden-Harris Plan to Build Back Better in Rural America calls for a dedicated agenda to address longstanding inequities in agriculture, and contains numerous promises to begin the long overdue process to redress the harms done to these communities of farmers, ranchers, and fishers by the federal government. Specific commitments include establishing an Equity Commission to ensure that all USDA programs and policies support BIPOC producers, assisting with credit access and in securing farmland, protecting the rights of heirs' property, providing farmworkers with much needed personal, labor, and safety protections, and committing to fairness, accountability, and transparency across USDA. NSAC firmly believes that there cannot be a just, resilient, and sustainable food system without meaningful action on all of these issues.

The Administration must meet its commitment to racial equity at USDA and in every Agency, and across every program and administrative action. To support that commitment, this document leads each section with specific recommendations intended to help the Administration center racial equity in program design and implementation as they staff, engage, prioritize, plan, implement, monitor, and evaluate their work to “Advance racial economic equity in rural America, including by tackling longstanding inequities in agriculture.”

Food Systems to Help Communities Thrive and Support Safe Food Producers

“FOSTER THE DEVELOPMENT OF REGIONAL FOOD SYSTEMS: *Biden will partner with small and midsized farmers to help them collectively create supply chains to deliver fresh produce and other products to schools, hospitals, and other major state and federal institutions, including the Defense Department. This will allow these farmers to negotiate their own prices. And, it will help farmers identify markets for specialty crops and secondary products, like ice cream produced by dairy farmers to bring in additional revenue.”*

– Biden-Harris Plan to Build Back Better

Robust and targeted investments are needed to support regional food systems development and rural economies throughout the country. In line with the Biden-Harris Administration’s commitment to regional food systems, this document contains recommendations that will help build more robust and resilient supply chains while supporting farmers’ bottom line. These policy options will ultimately help family farmers and small and mid-sized operations thrive and keep pace with the growing demand for healthy and regionally produced food. This calls for a cross agency ‘Local, Regional, and Resilient’ Initiative to boost community food security and regional infrastructure, and reforms to, and renewed investments in Value Added Producer Grants, Farmers Market and Local Food Promotion Program, and Regional Food Systems Partnership Program. Supporting expanded data collection by USDA will strengthen local and

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regional markets, and providing organic and local pricing information will help ensure that farmers are paid a fair price for their farm goods.

Additionally, whether it is on the farm or in the development of sustainable and resilient food chains, risk and scale appropriate food safety rules and regulations are also critical to ensuring family farmers and small and medium sized operations can thrive. Beyond appropriate regulatory frameworks, there is a strong need for targeted financial assistance and training focused on the specific needs of farmers and ranchers serving local and regional markets. This document includes food safety recommendations in two sections – one for USDA policy and one for FDA policy – that are critical to fostering the further development of regional food systems that will allow beginning farmers, farmers of color, and small and mid-sized operations to be successful. There are also recommendations to ensure USDA collect and report program and demographic participation data to better support small plants and farmers as they obtain and maintain Good Agricultural Practices (GAP) certification. Finally, there are recommendations for FDA to require organizations that receive FDA and USDA funding for food safety outreach, education, and training to collect demographic data on the target audience served, ensure the Food Safety Modernization Act (FSMA) Produce Safety Rule exemptions do not exclude produce grown by farmers of color, and continue to gather input from small and very small farms and small food businesses subject to the new FSMA rules through listening sessions, in partnership with farmer-based organizations.

Helping the Next Generation Begin and Succeed as Farmers

“SUPPORT BEGINNING FARMERS: America tries to make it easy to start a business, but unless you inherit the land, it’s much more difficult to start a farm. Biden will expand the Obama-Biden Administration’s microloan program for new and beginning farmers, doubling the maximum loan amount to \$100,000. And, he will increase funding for the USDA’s farm ownership and operating loans that typically serve beginning farmers who grew up on a family farm but need low-cost capital to add to their family’s operation to support another household.”

– Biden-Harris Plan to Build Back Better

The Biden-Harris Plan to Build Back Better in Rural America recognizes the need to bring new farmers into agriculture but that there are real challenges for those that do not inherit land. The BBB Plan calls for increased grants, loans, and other programs to help beginning farmers become established. NSAC applauds these commitments to support both our nation’s beginning and socially disadvantaged producers. In line with these commitments, we would further recommend that the Administration create a longer-term vision for what is truly needed to make farming a viable career for future generations. This document includes recommendations on developing a strategic plan for how to train new farmers, launching a USDA-wide initiative to expand opportunities for new farmers and farmers of color, with focus on farm transfer,

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farmland transition, and farmland access, and quick implementation of the new Heirs Property relending program and data collection efforts on farmland ownership trends.

Fair Markets, Fair Programs, and Fair Access

“STRENGTHEN ANTITRUST ENFORCEMENT: *From the inputs they depend on – such as seeds – to the markets where they sell their products, American farmers and ranchers are being hurt by increasing market concentration. Biden will make sure farmers and producers have access to fair markets where they can compete and get fair prices for their products – and require large corporations to play by the rules instead of writing them – by strengthening enforcement of the Sherman and Clayton Antitrust Acts and the Packers and Stockyards Act.”*
– Biden-Harris Plan to Build Back Better

The Biden-Harris Plan to Build Back Better in Rural America recognizes the harmful impacts of concentration in the agricultural sector on American farmers and ranchers and the need to strengthen antitrust enforcement to protect producers. NSAC applauds this commitment to ensuring fair markets and robust antitrust enforcement. In line with that commitment, this document contains recommendations that will help the Administration restore the former Grain Inspection, Packers, and Stockyards Administration (now the Packers and Stockyards Division) to a standalone agency within the U.S. Department of Agriculture, reverse and mitigate the impacts of consolidation in the agricultural sector, study the impact on private ownership of farmland caused by increased purchase of prime agriculture lands by private equity firms and other non-farming, corporate entities, and examine proposed mergers and the financing mechanisms that facilitate concentration throughout the agricultural sector.

Changing the Approach to Immigration and Agriculture

“EXPANDING PROTECTIONS FOR FARM WORKERS: *Farm workers – who are disproportionately Latino and immigrant workers – have always been essential to working our farms and feeding our country. As President, Biden will ensure farm workers are treated with the dignity and respect they deserve, regardless of immigration status. He will work with Congress to provide legal status based on prior agricultural work history, ensure they can earn paid sick time, and require that labor and safety rules, including overtime, humane living conditions, and protection from pesticide and heat exposure, are strictly enforced.”* – Biden-Harris Plan to Build Back Better

The inability of Congress to pass comprehensive immigration reform and to address the status of the estimated 11 million undocumented immigrants has created a policy void that provides the opportunity to reassess the United States’ approach to “temporary” workers and the structural defects in the existing guestworker programs, none of which were satisfactorily resolved in comprehensive immigration reform bills of 2006, 2007 and 2013. The Biden-Harris Administration has an opportunity to “get it right” and to genuinely reform federal

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immigration policies providing a path for the undocumented to gain permanent residency, and for more just programs for foreign-born temporary workers and to protect all who work on our farms from harm.

Farmer-Centered, Climate-Focused Conservation Programs

“STAND WITH FARMERS, FISHERS, AND RANCHERS AS THEY FIGHT AGAINST THE THREATS OF CLIMATE CHANGE, DROUGHTS, FLOODING AND EXTREME WEATHER: *The Biden-Harris BBB agenda states “the government needs to partner with farmers to accelerate progress toward net-zero emissions,” and that the Biden-Harris Administration will “ensure our agricultural sector is the first in the world to achieve net-zero emissions, and that our farmers earn income as we meet this milestone.” To reach these goals, the BBB plan holds that the Biden-Harris Administration will “dramatically expand and fortify the pioneering Conservation Stewardship Program to support farm income through payments based on farmers’ practices to protect the environment, including carbon sequestration.” Furthermore, the BBB plan states that “Biden will direct his Department of Agriculture to review the agency’s programs [...] and design a plan to ensure they are geared to farmers, ranchers, and fishers who are as different and varied as the landscape of the country.”*

– Biden-Harris Plan to Build Back Better

NSAC applauds these commitments to recognize farmers and ranchers as critical partners in our efforts to address the climate crisis and to provide the tools and resources they will need to transition to climate-friendly production systems. In support of these goals, this document contains recommendations to enhance the Conservation Stewardship Program by incorporating elements of the *Agriculture Resilience Act* (ARA) to address climate challenges to U.S. agriculture. The ARA establishes an ambitious, science-based goal of making U.S. agriculture climate neutral by 2040, and greatly expands investment in USDA research, extension, and conservation programs to build a truly sustainable, climate-resilient, and climate-friendly food and agricultural system. The Administration can take further steps to support a national pivot to a more environmentally and economically sustainable food production system by establishing an FSA team to transform the Conservation Reserve Program (CRP) into a climate and water quality program, align crop insurance Good Farming Practices (GFP) to better support conservation, improve and accelerate adoption of cropping management plans to build soil health, and create a the Soil Health and Greenhouse Gas Federal Advisory Committee to ensure all USDA conservation programs align in supporting farmer and rancher efforts to adapt to and mitigate the impacts of climate change.

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As the Biden-Harris Administration seeks to enable farmers and ranchers with a CSP contract to participate in carbon markets, NSAC urges the institution of a Technical Service Provider (TSP) and verifier certification protocol that contains strong conflict of interest and accreditation provisions. The Administration can also implement a trial run of third party (USDA accredited) climate markets through Conservation Innovation Grants (CIG) or RCPP grant awards next year. Finally, NSAC recommends the Administration coordinate USDA conservation and research programs to develop and test methodologies that can quantify and document carbon sequestration, greenhouse gas reduction, soil carbon and nitrogen dynamics resulting from soil health and other conservation activities, and support the transition to pasture-based livestock production systems to maximize soil carbon sequestration and reduce greenhouse gas emissions from livestock production.

“INVEST IN PROGRAMS such as Working Lands for Wildlife within the Natural Resources Conservation Service (NRCS) at USDA that provide incentives, including regulatory certainty, for landowners to engage in voluntary restoration efforts on their lands which create or restore habitats where wildlife thrive and landowners in rural communities can prosper.”

– Biden-Harris Plan to Build Back Better

NSAC is encouraged by the inclusion of Working Lands for Wildlife (WLFW) in the Biden-Harris BBB plan and has long supported programs that aid species such as the greater sage grouse, monarch butterfly, and other state-identified species of conservation need. We would underscore that two of the largest NRCS working lands programs, EQIP and CSP, contain practices that are meant to help conserve wildlife habitat on private land. In addition to bolstering the WLFW programs, strengthening the wildlife-centric practices in EQIP and CSP would facilitate the conservation of habitat for endangered species and those that are in need of conservation.

Science that Serves Farmers

“RE-INVEST IN LAND GRANT UNIVERSITIES’ AGRICULTURAL RESEARCH so the public, not private companies, owns patents to agricultural advances. Biden will bolster funding for the Sustainable Agriculture Research and Education Program and the National Institute of Food and Agriculture. Our farmers need new technologies to compete in world markets while protecting our soil and water. These new technologies – and the next new seeds – should be developed and owned by the American people, not private companies who can use patents to expand profits.” – Biden-Harris Plan to Build Back Better

The Biden-Harris BBB plan recognizes the importance of sustainable agriculture research and education where the public reaps the benefits of technological and sustainable agriculture practices emerging from greater public investments in agricultural research. Increased

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investments into sustainable agriculture, soil health, and climate mitigation research to provide new tools and practices to enable American farmers and ranchers to become more sustainable, productive, and competitive in a global economy are critical. Agriculture research overseen by USDA should be accessible, equitable, and ensure that researchers and farmers from underrepresented communities also benefit from public research and education dollars. In support of these goals, this document contains recommendations to ensure increased investment in public agricultural research including advancing REE science capacity, establish a budgetary plan with a goal of reaching \$1 billion in discretionary funding for NIFA competitive programs by FY 2024, and increase priority and funding across NIFA competitive grant programs for agroecological research and systems-based approaches to mitigating the impacts of the climate crisis on farms and rural communities.

Key elements of this renewed research agenda include: Prioritizing climate change mitigation and adaptation research within the Sustainable Agriculture Research and Education (SARE) program; creating dedicated funding for plant breeding and cultivar development projects; expanding NIFA capacity building grants for Black, Indigenous, People of Color (BIPOC) farmers within key NIFA programs that offer grants for capacity building; prioritizing climate change mitigation and adaptation agricultural research (which spans disciplinary boundaries and includes agroecological, applied economics, integrated human nutrition science and policy, and system science principles) across REE agencies; and committing to research on the impacts of climate change on farmers of color, farmworkers and food system workers, members of low-income communities, and how public investment can restore racial equity and environmental justice, mitigate climate change impacts, and build resilience for vulnerable communities.

FOOD SYSTEMS TO HELP COMMUNITIES THRIVE

CENTERING RACIAL EQUITY IN PROGRAM DESIGN AND IMPLEMENTATION

- USDA must commit to equitable design and implementation of all programs. For programs that support food systems and direct marketing, the Administration should:
 - Actively conduct outreach to and recruitment of black, Indigenous and people of color (BIPOC) producers and organizations for grant review panels and USDA advisory committees and strive to ensure that the final make up of committees and review panels reflects the diversity of the constituencies they serve.
 - Commit to prioritize the ranking of all Local Agriculture Market Program (LAMP) grant program applications that are submitted by, or intend to serve, beginning farmers or ranchers, socially disadvantaged farmers or ranchers, operators of small or medium sized farms or ranches that are structured as family farms, and veteran farmers or ranchers.

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- Fully implement the 2018 Farm Bill and develop a rule that would allow applicants to apply for food safety financial assistance through the Value Added Producer Grant Program (VAPG) (both for food safety-only applicants and working capital applicants) and prioritize applications from socially disadvantaged farmers or ranchers as part of that rulemaking. Commit to developing and finalizing the rule in time for a fall or winter 2021 application.
- Provide dedicated staff and enter into cooperative agreements to help conduct additional outreach and technical assistance for the VAPG program, train State Rural Development office staff about the program, and support non-governmental organizations (NGOs) and Extension staff conducting outreach and assistance for the program. Prioritize providing additional outreach and technical assistance in underserved communities, tribal communities, and for socially disadvantaged farmers and ranchers.
- Resume offering a multi-year Community Food Projects (CFP) Training and Technical Assistance competitive grant (NIFA) available to NGOs to support CFP applicants and grantees with community appropriate technical assistance, capacity building, and program evaluation assistance.
- Include full funding of \$20 million in every fiscal year in the USDA's annual budget request to the White House for the Office of Urban Agriculture and Innovative Forms of Production.
- Permit 100% in kind contributions to meet the 25% matching funding requirement for the Regional Food Systems Partnership Program and exempt tribal communities from the program priority of "leverage significant non-federal financial and technical resources."
- Reverse USDA's decision to increase maximum grant sizes for Farmers Market Promotion Program (FMPP) grants which has led to fewer awards and increased competition for a limited pool of funding. This has caused applicants with quality projects to decide not to apply or reapply due to frustration at the low success rates, negatively affecting the ability of BIPOC lead and BIPOC servicing organizations to access FMPP funding. USDA should request proposals for less than \$50,000 for FMPP "capacity building" grants and "Community development, training and technical assistance" grants.

RESILIENT FOOD SYSTEMS TO HELP COMMUNITIES THRIVE

NSAC recognizes that major investments in infrastructure are needed to support rural economies including rail and water transportation, renewable energy production and distribution, and broadband. In addition to these traditional areas of concern, we believe significant investments in infrastructure that connect farmers to consumers, diversifies market opportunities, increases resiliency, and expands access to healthy food are needed to support the farm economy. Building more robust and resilient supply chains will help farmers keep pace with the growing demand for regionally produced food and, by building upon successful

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programs and forging innovative public-private partnerships, it is possible to drive the transformation of regional food “enterprises” into regional food “economies.”

Local, Regional, and Resilient Cross-Agency Initiative

The Administration should launch a cross-agency ‘Regional Resilience Initiative’ that builds upon the successful ‘Know Your Farmer, Know Your Food’ initiative and focuses on how the development of more robust local and regional food systems can boost community food security and resilience in the face of disruptions such as the ongoing coronavirus pandemic.

- Create a Local and Regional Food Systems Resiliency Director position within the Office of the Secretary to identify opportunities and coordinate existing USDA resources to better serve and promote resilient local and regional food systems.
- Conduct analysis of current and past regional food system projects to determine which interventions are most likely to improve food system resilience, increase redundancy and diversity in slaughter and food processing facilities, and reinforce short supply chains that ensure greater returns to farmers for their goods.
- Prepare recommendations for new initiatives and administrative changes to existing programs and policies that improve food system resilience, increase redundancy and diversity in slaughter and food processing facilities, and reinforce short supply chains that ensure greater returns to farmers for their goods
- Require the Agricultural Marketing Service to conduct applied research, virtual outreach, and distance learning to help farmers, food businesses, and food market managers respond more successfully to severe disruptions in food supply chains resulting from the coronavirus pandemic.

Local Agriculture Market Program

The 2018 Farm Bill builds upon past farm bills, addressing both the growing nature of the local and regional food sector and the current lack of permanent baseline funding for critical USDA programs. The Farm Bill created the Local Agriculture Market Program (LAMP) and provided the program with \$50 million per year in mandatory funds in perpetuity.

LAMP is an umbrella program that partially combines and streamlines the Farmers Market and Local Food Promotion Program (FMLFPP) and Value-Added Producers Grant Program (VAPG) while providing permanent mandatory funding for the programs. LAMP also includes the new Regional Food Systems Partnership Program that uses federal resources to leverage private investment and encourage “food-shed” level approaches to developing regional food economies. LAMP also adds new functions to those programs related to value chain coordination, food safety infrastructure development, and food safety certification.

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Farmers Market and Local Food Promotion Program

The Farmers Market and Local Food Promotion Program (FMLFPP) is a competitive grants program that supports the development and expansion of local and regional food markets. FMLFPP is administered as two subprograms: the Farmers Market Promotion Program (FMPP) and the Local Food Promotion Program (LFPP).

- Use the authority granted by the 2018 farm bill to establish a simplified application for FMPP grants under \$50,000 and prioritize applications serving socially disadvantaged producers and underserved communities.
- Include funding of at least \$10 million per fiscal year for FMLFPP in the USDA's annual budget request to the White House.

Value-Added Producer Grant Program

The Value-Added Producer Grant (VAPG) program provides grants to help farmers, ranchers, groups of producers, and producer cooperatives to develop business plans, conduct feasibility studies, or acquire working capital to develop value-added, producer-owned businesses. Value-added enterprises help increase farm income and marketing opportunities, create new jobs, contribute to community economic development, and enhance food choices for consumers.

- Commit to prioritize the ranking of applications that are submitted by, or intend to serve, beginning farmers or ranchers, socially disadvantaged farmers or ranchers, operators of small or medium sized farms or ranches that are structured as family farms, and veteran farmers or ranchers.
- Prioritize providing additional outreach and technical assistance in underserved communities, tribal communities and for socially disadvantaged farmers and ranchers.
- Commit to issuing the VAPG annual funding notice consistently each year on a set-schedule during the Fall and Winter, when most farmers and ranchers have the capacity to develop project proposals.
- Adopt a fair, consistent, effective, coordinated external peer review panel as is done with the other competitive grants programs that are part of LAMP.
- Develop a rule for the program to allow an option for VAPG applicants to apply directly for food safety financial assistance (both for food safety-only applicants and working capital applicants) with priority given to infrastructure and equipment upgrades that will improve on-farm food safety practices. Commit to developing and finalizing the rule in time for a fall or winter 2021 application.
- Provide dedicated staff and enter into cooperative agreements to help conduct additional outreach and technical assistance for the VAPG program, train State Rural Development office staff about the program, and support NGOs and Extension staff conducting outreach and assistance for the program.

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- Include funding of at least \$25 million per fiscal year for VAPG in the USDA's annual budget request to the White House.

Regional Food Systems Partnerships

The Regional Food Systems Partnership (RFSP) program supports local and regional food economy entrepreneurs and organizations as they develop 'foodshed-level' approaches to building regional food economies. The partnership grants encourage public-private partnerships by using federal resources to leverage private investment and the formation of multi-stakeholder partnerships that carry out programming leads to expansive and integrated on-the-ground projects.

- Fully implement 2018 Farm Bill authority that allows partnerships to act on behalf of producers or eligible entities in applying for FMPP, LFPP, and VAPG grants. Develop a memorandum of understanding or interagency agreement with other federal agencies as warranted to expand the list of current programs (VAPG, FMPP, and LFPP) to which grantees/partnerships can apply on behalf of other orgs and farmers to include:
 - Specialty Crop Block Grants (AMS)
 - Rural Microentrepreneur Assistance Program (RBCS)
 - Business and Industry Local and Regional Food Enterprise Guaranteed Loans (RBCS)
 - Rural Cooperative Development Grants (RBCS)
 - Healthy Food Financing Initiative (RBCS)
 - National Organic Certification Cost-share Assistance (FSA)
 - Direct Loans and Microloans (FSA)
 - Gus Schumacher Nutrition Incentives Program (NIFA)
 - Beginning Farmer and Rancher Development Program (NIFA)
 - Outreach and Assistance for Socially Disadvantaged Farmers and Ranchers and Veteran Farmers and Ranchers (OPPE)
 - Community Food Project Grants (NIFA)
- Fully implement the 2018 Farm Bill authority to allow eligible entities to apply for RFSP, FMPP and LFPP grants in a single application.
- Permit 100% in kind contributions to meet the 25% matching funding requirement and exempt tribal communities from the program priority of "leverage significant non-federal financial and technical resources."

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National Sustainable Agriculture Information Service

The National Sustainable Agriculture Information Service, also known as Appropriate Technology Transfer for Rural Areas (ATTRA), is managed by the National Center for Appropriate Technology (NCAT). ATTRA offers a wide variety of information and free resources on sustainable agriculture from horticultural and agronomic crops to livestock production systems, business planning, and farm succession. ATTRA's services help U.S. farmers, ranchers and communities build robust and resilient food systems.

- Include full funding, \$5 million per fiscal year, for ATTRA in the USDA's annual budget request to the White House.

HELPING FARMERS FEED THEIR COMMUNITIES

Federal nutrition programs like SNAP, WIC, and school meal programs are essential to increasing food security for low income families. Farmers help ensure that everyone in our country can have access to healthy, fresh, local foods by providing their farm goods directly to these customers through the redemption of federal nutrition benefits at farmers markets, Community Supported Agriculture (CSA,) and other direct market outlets. However, federal and private efforts to increase access to fresh, healthy, local food through direct marketing outlets have fallen short, resulting in missed opportunities to improve the health and wellbeing of underserved and vulnerable communities while boosting small farm income.

Connecting Farmers Through Electronic Benefit Transfers (EBT)

USDA has taken a number of important steps to improve the opportunity for people to use their SNAP and WIC benefits at farmers markets and CSAs. However, as these programs transitioned to EBT systems the complexity of ensuring universal access and program integrity have been challenges that USDA has not yet fully addressed as they have sought to lower barriers to participation, provide necessary equipment and technical support, and accommodate rapidly evolving payment technologies. Elevating and prioritizing this critical healthy food access issue must be a priority for a new administration.

- Create a new "EBT and Food Systems Director" position within the Office of the Under Secretary for Food, Nutrition, and Consumer Services to lead the development and implementation of a comprehensive department wide strategy to support the use of EBT at farmers markets, other direct marketing outlets and retail grocery stores. Invest in the development of an Online SNAP Portal and the associated regulatory and information technology infrastructure that would allow for the cost-effective acceptance

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of SNAP online by direct market farmers, relevant small businesses and independent grocery retailers.

- Ensure that SNAP, P-SNAP, WIC and nutrition incentive programs can be redeemed at farmers market locations or for the purchase of CSAs using available EBT technologies.
- Continue to allow farmers markets to employ a single point of sale device at multiple locations.

SUPPORTING REGIONAL FOOD ECONOMIES

Expand Local and Regional Food Data Collection Efforts

- Expand local and regional food data collection and reporting through the Agricultural Marketing Service (AMS) Local and Regional Food Market News and local and regional food systems research initiatives.
- Increase National Agricultural Statistics Service (NASS) local food producer surveys to gather more robust data on the marketplace including much needed data on organic pricing
- Direct AMS to utilize the Perishable Agricultural Commodities Act (PACA) to facilitate produce price discovery by requiring them to publish anonymized, regional, farm-gate prices paid to farmers. Include delineation of direct market vs intermediated prices paid to farmers as part of the required produce price discovery.

Support Urban Farmers and Food Systems

- Appoint members of the Urban Agriculture and Innovative Production Advisory Committee & prioritize BIPOC urban farmer and advocate membership on this committee, as well as on the Urban and Suburban County Committees.
- Include full funding of \$20 million in every fiscal year in the USDA's annual budget request to the White House for the Office of Urban Agriculture and Innovative Forms of Production.

Help Farmers Transition to Meet Organic Demand

- Support the National Organic Cost Share Certification Program (NOCCSP) to help farmers meet current, and future, consumer demand and expand outreach and education opportunities for historically underserved and beginning farmers and ranchers.
- Restore the funding formula for this program to the levels delineated in the 2018 Farm Bill of a 75% reimbursement of certification costs up to \$750 per scope.

Restore Office of the Under Secretary of Rural Development

- Prioritize the appointment of the Under Secretary for Rural Development, a position which has remained vacant despite being formally reestablished in the 2018 Farm Bill.
 - Provide the Rural Development mission area with robust funding in keeping with historic levels.
-

FAIR MARKETS, FAIR PROGRAMS, AND FAIR ACCESS

CENTERING RACIAL EQUITY IN PROGRAM DESIGN AND IMPLEMENTATION

- USDA must commit to racial equity in the design and implementation of all programs. For programs that support farmers' access to credit, fairness in markets, and a robust farm safety net, the Administration should:
 - Reform FSA oversight to ensure timely, Federal-level review of denied FSA loan applications, withdrawn loan applications, and withdrawn NAD appeals. This should include an annual, systematic review of FSA officers' loan portfolios for discriminatory action and a publicly available report of 5 years of historical data on application time to completion.
 - Ensure that demographic data is uniformly collected and publicly reported across all FSA programs (including for existing FSA customers). This should include releasing disaggregated demographic annual loan data to Congress and the public, as required by the 2018 Farm Bill, to increase transparency and accountability in FSA lending.
 - Modify the NAD administrative judge performance evaluation process to remove NAD appeal outcomes from evaluation criteria.
 - Conduct a review of existing RMA policy to assess barriers to participation for farmers of color in federal crop insurance programs and undertake a systemic review of federal crop insurance servicing to determine any patterns of discriminatory action or program application.
- Commit to doubling the total funding available for programs and projects serving underserved communities – including farmers of color, women, urban, immigrant, and refugee farmers, as well as military veterans.

MAKING MARKETS FAIR

As many sectors of the food economy continue rapid integration and consolidation, farmers and ranchers are increasingly producing for a highly concentrated market with just a handful of national or multinational firms controlling most the market for many commodities. For example, the top four processing firms for beef, pork and chicken control from 54 to 85 percent of the U.S. market for their commodity. At the local level, this means a single processing firm is often the only marketing option for a farmer, eliminating price-enhancing competition. In many parts of rural America, farmers have few options but to do business with livestock and poultry integrators, inviting abusive contract and market terms. The incoming Administration should work closely with USDA, Department of Justice (DOJ), and the Federal Trade Commission (FTC) to vigorously enforce the Packers and Stockyards Act and antitrust laws to create a more fair and competitive market and protect the rights and livelihoods of farmers and ranchers.

- Withdraw the Farmer Fair Practices proposed final rule and reissue a rule that supports the original intent of the Packers and Stockyards Act, to ensure that poultry and livestock corporations treat American livestock and poultry farmers fairly, and issue a plan for the vigorous enforcement of these rules with roles for USDA, DOJ, and the Federal Trade Commission to create a more fair and competitive market and protect the rights and livelihoods of farmers and ranchers
- Restore the Grain Inspection, Packers and Stockyards Administration to a standalone agency
- Consider proposed mergers and acquisitions, joint ventures, and investments in food, seed, fertilizer, pesticides, and other inputs, and distribution companies as ‘of national significance’ and eligible for heightened regulatory scrutiny.
- Implement stricter financing requirements for federally backed loans made for contract animal agriculture facilities to ensure that production contract lengths equal the length of the loans, that production contracts include binding delivery requirements (weight, flocks, etc.) when federally backed loans are used to finance a facility, and that a signed contract must be in place in order for a contract production operation loan to be made, even for preferred lenders.
- Direct the Office of the Chief Economist to conduct a comprehensive study of shifting land ownership patterns, including increasing purchases of prime agriculture lands by private equity firms and other non-farming, corporate entities, and the anticipated impact on private ownership of farming or ranching lands in the coming decades.

Helping the Next Generation Begin and Succeed as Farmers

- USDA must commit to ensuring a new generation of farmers is prepared and supported to enter and thrive in agriculture. The Administration will create a public plan that requires:
 - Development of a long-term strategic plan for the Beginning Farmer and Rancher Development Program (BFRDP) to identify needs within the program, both regionally and industry-specific, and establish consistent funding allocations to invest in innovative and multi-year programs that not only train the next generation of farmers but also build more resilient, climate-friendly, and successful models of farming.
 - Implement requirements that BFRDP projects be farmer-driven, develop innovative approaches to reach new audiences of farmers through partnership with community-based organizations, and that priority is given to grant partnerships led by farmer-based non-profit and community-based organizations.
- Launch a USDA wide initiative to expand opportunities for new farmers, particularly new farmers of color, with focus on farm transfer and farmland transition, farmland access, and tenure. A particular focus should be given to resolving heirs property issues and outreach to non-operating landowners. As part of this initiative, USDA should move quickly to implement the new Heirs Property relending program, an updated Tenure, Ownership, and Transfer of Agricultural Land (TOTAL) survey, and should seek input from the USDA Advisory Committee on Beginning Farmers and Ranchers (ACBFR), including recommendations previously developed by the ACBFR Land Tenure Subcommittee.
- Commit to funding USDA state beginning farmer coordinators as full-time equivalent positions, rather than as a collateral responsibility for existing staff, to expand their capacity, reach, and ultimate effectiveness.
- Launch a robust outreach initiative utilizing targeted funding provided by the 2018 Farm Bill to more effectively use the Conservation Reserve Program - Transition Incentive Program (CRP TIP) to facilitate land transition to the next generation of farmers, with a particular focus on transitioning land to farmers of color. Specific actions include:
 - Funding organizations who work on the ground with farmers to lead outreach efforts, with a particular focus on partnering with organizations serving farmers of color
 - Enabling CRP landowners to opt-in to communications around CRP-TIP to better facilitate connection with interested farmers looking for farmland
 - Contacting CRP contract holders earlier, more often, and through a variety of methods

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- Ensuring all FSA field office staff are trained and knowledgeable about CRP-TIP, and are familiar with land-linking resources and partners in their region
- Conducting an analysis of CRP-TIP land attributes and characteristics to facilitate a better understanding of land available through CRP-TIP

Targeted Support So All Can Farm

- Reform the administration and peer review of the Outreach and Assistance for Socially Disadvantaged and Veteran Farmers and Ranchers (i.e. 2501) competitive grant program to ensure a more transparent, timely, and responsive process by establishing a consistent Fall/Winter application period, with a minimum 90-day application window, to allow ample time for individuals to prepare and submit applications. USDA should seek external expertise to manage and improve the 2501 peer review process, in a similar manner to grant programs administered by the Agricultural Marketing Service
- Ensure that all funding provided by Congress for the 2501 program exclusively supports projects that benefit farmers of color and military veterans. Funding should not in any way be used for other purposes - such as developing rural prosperity councils, limiting funding to faith-based organizations, or narrowing scope to solely address persistent poverty communities.
- Increase transparency and public access to program grantee and project information. Coordinate with NIFA to explore ways that the 2501 program can leverage the grant-making agency's CRIS and REEport data reporting interface and online portal to ensure stakeholders and policymakers are able to obtain up to-date information on the status and outcomes of funded projects. Make information publicly available on project outcomes, and impacts, including evaluation metrics and more robust evaluation and reporting requirements for project grantees.

Expanding Credit for Family Farmers

- Issue guidance on equitable relief provisions of the 2018 Farm Bill to ensure that farmers who incurred an economic loss or were denied credit because of the actions of, or information provided by, a USDA employee can be compensated, or otherwise made whole, for lost farming revenue and any consequential losses.
- Direct the Office of the Chief Economist to review the lending practices of the Farm Credit System and describe legislative, administrative, or regulatory reforms that would permit the Government Sponsored Entity (GSE) to more fully support local and regional sustainable food systems, socially disadvantaged farmers and ranchers, particularly farmers of color, and young, beginning and small (YBS) farmers and farmworkers working to transition to farm management or ownership.
- Direct FSA to prioritize loan restructuring in both direct and guaranteed loans, rather than farm foreclosure, by proactively and creatively using all tools possible including

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debt relief, automatic loan deferment and forbearance for both direct and guaranteed loans, interest assist, and flexible and emergency access to credit.

Modernize USDA Operations and Improve Accountability

- Reform FSA practices and policies across all programs to ensure all county offices are adequately staffed to meet producer needs and automatically provide receipt for service.
- Launch an initiative to improve USDA online accessibility and develop access to options for loan servicing, self-registering of farms, applying for grants, and accessing resources and research for farmers comparable to those available in person at FSA offices, in consultation with the US Digital Service.
- Institute new protocols and provide resources to ensure that OPPE meets its statutory mission to both advocate for small, minority, and beginning farmers within USDA, as well as coordinate outreach activities. This includes taking steps to ensure OPPE will be a place where:
 - New policy initiatives and policy coordination ideas are developed for the consideration of the Secretary;
 - All regulatory matters get reviewed for impacts on Small Farmers, Beginning Farmers and Ranchers, Socially Disadvantaged Farmers and Ranchers, Military Veteran Farmers and Ranchers, and Women Farmers and Ranchers;
 - Departmental goals and objectives related to the structure of agriculture get articulated and benchmarks get set by which to measure future outcomes;
 - Operations and functions of the Office of Small Farms Coordination and the Farmworker Coordinator have the resources, authority, and coordinating capacity to assure diverse perspectives and needs are fully integrated into interagency functions; and
 - Oversight, accountability, and transparency of OPPE activities is enhanced by conducting annual reports on office initiatives, achievements, and recommendations for future activities. Evaluation reports should be made publicly available and provide opportunity for public comment.
- Convene regular annual meetings of both the Advisory Committee on Beginning Farmers and Ranchers and the Advisory Committee on Minority Farmers and Ranchers and increase transparency of committee activities, including posting up-to-date information on committee membership, meeting minutes, and agendas on the committee website.

REFORM THE FARM SAFETY NET

- Initiate a national pilot program with federal support to test the use of a discount on federal crop insurance for farmers who adopt soil health practices that increase soil carbon and improve their soil's resilience to weather extremes expanding on the models currently offered in Iowa and Illinois.
- Improve access to the Whole Farm Revenue Protection (WFRP) program through crop insurance agent and adjuster education, a national hotline to answer agent questions, simplifying the program application for farmers, promoting WFRP to diversified organic and non-organic farms and livestock producers, and renegotiating the Standard Reinsurance Agreement (SRA) with Approved Insurance Providers (AIP) to ensure a compensation structure that does not disadvantage WFRP.
- Improve the utility of the WFRP program by elimination of the current expense reporting requirements, requiring that applicants only need to provide tax records as sufficient documentation in calculating revenue guarantees and in determining indemnity payments, counting indemnity payments as historic revenue for claims adjustment purposes, and creating an on-line tool for farmers to organize needed documents in advance of visiting an agent.
- Direct the Office of the Chief Economist to conduct a comprehensive study, in coordination with the Administrator of the Risk Management Agency, on the impact of the federal crop insurance program on the adoption of farming practices and their impacts on climate change, leading to recommendations on how the programs can better support and reward farmers who have invested in crop and animal diversity, soil health, water conservation, or value-added production activities that increase climate resiliency and reduce risk.
- Improve cover crop termination guidelines to make guidance clearer and more farmer-friendly and remove obstacles to crop insurance coverage by adding the increasingly common practices intercropping, interseeding, relay planting, strip intercropping, and planting green as practices that do not affect the insurability of crops.
- Modify the Good Farming Practices handbook to make clear that all NRCS conservation practices and enhancements are Good Farming Practices, without caveat or exception.
- Ensure that the Non-Insured Crop Disaster Assistance Program (NAP) is available to more farmers by allowing the use of direct-market and organic prices for all NAP eligible crops.
- Continue RMA's support of an annual NASS Organic Production Survey beyond 2020 to continue to expand offerings for organic price elections based on actual market prices and contract price addendums without any artificial limit.
- Implement a 60 or 65 percent of county T-Yield for Actual Production History (APH) purposes as part of prevented planting coverage, when a farmer chooses to not plant a cover crop on prevent plant acres.

CHANGING THE APPROACH: IMMIGRATION REFORM AND AGRICULTURE

The inability of Congress to pass comprehensive immigration reform and to address the status of the estimated 11 million undocumented immigrants has created a policy void that provides the opportunity to reassess the United States' approach to "temporary" workers and the structural defects in the existing guestworker programs, none of which were satisfactorily resolved in comprehensive immigration reform bills of 2006, 2007 and 2013. The new administration has an opportunity to "get it right" and to genuinely reform our policies regarding providing a path for the undocumented to gain permanent residency, and for more just programs for foreign-born temporary workers.

Guestworker programs, such as H-2A, suffer from the same structural defect - they provide temporary workers to the companies that have been least successful in attracting a labor force. The visas are given to workers, but the visas are tied to specific businesses, which often use intermediaries to recruit, transport, and supervise the workers. The lack of portability of the visa inevitably leads to abuses by the intermediaries or employers such as taking bribes, charging workers for equipment or transport, or demanding a portion of future earnings - since the workers fear retaliation if they complain. The current system also frequently results in temporary workers becoming undocumented through no fault of their own, when their employers deviate from the location or type of work that the government approved, putting these workers at risk of removal, and also prejudicing their ability to obtain new visas or readmission to the U.S. These heavily bureaucratic programs should be abandoned for an approach that gives the workers agency via a portable work visa and allows the labor market to function. Any replacement temporary visa program should also allow for circularity (the ability to travel between the U.S. and the home country without the need to get a new visa each time), for derivative family members to accompany the principal nonimmigrant visa holder and to work legally in the U.S. without restrictions if they choose to do so, and should also provide the workers and their derivative family members with an eventual path to self-petition for permanent residency.

Protect Workers from Pesticides

- Restore the Worker Protection Standard (WPS) Application Exclusion Zone (AEZ) requirements and increase the monitoring and enforcement of the WPS.
- Create a plan to implement Risk Assessment Methods for Workers, Children of Workers in Agricultural Fields, and Pesticides with No Food Uses which requires the following:
 - using an additional safety/uncertainty factor to protect children;
 - considering aggregate exposures to pesticides from multiple sources;
 - considering cumulative effects that may occur from exposure to multiple pesticides with a common mechanism of toxicity; and

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- reporting potential risks for individuals who had not been explicitly considered, specifically workers age 12 – 17 and children taken into agricultural fields while their parents work.
 - Require that all pesticide label instructions be written in Spanish and in any language spoken by more than 500 pesticide applicators.
 - Require drift-protections on pesticide labels for drift-prone pesticides during product re-registrations using methods EPA has developed to assess risks from spray drift and pesticide volatilization to protect children and communities from pesticide drift.
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FARMER-CENTERED, CLIMATE-FOCUSED CONSERVATION PROGRAMS

CENTERING RACIAL EQUITY IN PROGRAM DESIGN AND IMPLEMENTATION

- USDA must commit to racially equitable design and implementation of all programs. For conservation programs, the Administration should create a public plan that requires:
 - Study and report of the impact of Environmental Quality Incentives Program (EQIP) funding of CAFOs on surrounding communities, which are often communities of color.
 - Create new Regional Conservation Partnership Program (RCPP) Critical Conservation Areas to cover significant gaps in geographic regions where many small scale farmers of color operate.
 - Ensure program eligibility rules do not exclude or pose barriers to tenant farmers who wish to participate in conservation programs, and payment structures that ensure tenants, not the cash landlords, collect the payments and other program cost shares.
 - Improve outreach and service delivery to farmers and ranchers of color and other historically underserved producers, including technical assistance with conservation planning and program application, and informing eligible producers of the EQIP advance payment option at time of enrollment and the set asides in Conservation Stewardship Program (CSP) and EQIP for socially disadvantaged and beginning farmers and ranchers.
 - Conduct and share transparent data collection on rates of farmers of color application and enrollment in all USDA conservation and easement programs, fund a study to identify causal factors in under-representation of farmers of

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color in program participation, and recommend strategies to create racial equity in program delivery.

- Commit to at least doubling funding available for conservation programs and projects serving underserved communities – including farmers of color, women, urban, immigrant, and refugee farmers, as well as farmworkers and military veterans.
- Design and implement all climate-mitigation and climate-resilience provisions within conservation programs and across mission areas so that they actively dismantle historical racism and thereby protect public health and food security, preserve natural resources, and provide environmental and climate justice for communities of color and other disproportionately impacted communities.
- Provide targeted technical assistance to help producers and communities of color and other historically underserved populations mitigate and adapt to the impacts of weather extremes and climate disruption through participation in conservation programs like CSP and EQIP, farmer-centered research and education through programs like the Sustainable Agriculture Research and Education Program (SARE), and local food systems through the Local Agriculture Marketing Program (LAMP) and other local food and urban agriculture programs.

PROGRAMS THAT HELP FARMERS BE TRUE STEWARDS OF THE LAND

USDA must commit to enhancing the capacity of existing conservation programs to support practices that optimize soil and agroecosystem health, sequester carbon and reduce greenhouse gas emissions, and build the resilience of farms, ranches, and rural communities to climate disruption, public health crises, and other stresses.

Conservation Stewardship Program (CSP)

The Conservation Stewardship Program (CSP) is a comprehensive working lands conservation program designed to protect and improve natural resources and the environment for generations to come. CSP takes a whole farm approach, targets funding to address particular resource concerns in a given watershed or region, and assists farmers and ranchers to improve soil, water, and air quality, provide increased biodiversity and wildlife and pollinator habitat, and conserve water and energy. USDA should restore CSP to its original statutory purpose - rewarding the nation's best land stewards and supporting them to achieve even higher levels of resource conservation, and soil restoration - and enhance the efficacy of the program.

- Revise procedures and ranking tools (CART) to score CSP applications based on the overall benefits of existing and additional conservation activities and the number of resource concerns addressed.
- Revise CSP payment schedules for all land uses to reward existing conservation activities and additional conservation activities equally to accurately reflect the

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environmental benefits, implementation costs, and foregone income of the whole farm conservation system.

- Ensure that CSP participants can apply for multiple contract renewals as long as they continue to maintain and enhance their whole farm conservation system.
- Prioritize, promote, and expedite the delivery of the supplemental CSP contract payments for comprehensive conservation planning to defray producer costs, the CSP cover crop bonus payment, the Resource-conserving Crop Rotation supplemental payment, and the Advanced Grazing Management supplemental payment.
- Issue a minimum CSP payment for all successful applicants (including contract renewals) of \$4000 per year for the FY 2021 and all future sign-up periods to incentivize the participation of smaller-acreage, specialty crop producers.
- Support adoption of advanced grazing management systems, such as management intensive rotational grazing (MIG) and crop-livestock integration, with robust ranking consideration, technical assistance for implementation, and bundled payment options.
- Increase support for organic and transitioning-organic producers by restoring enhancement activities designed for organic systems that were eliminated in the 2017 revision of the CSP.
- Create a pathway for Environmental Quality Incentives Program (EQIP) participants to “graduate” to the CSP while maintaining a clear distinction between the two programs. EQIP is a cost share program to help producers address specific environmental problems associated with production through basic conservation practices and structure or equipment installations while CSP is intended to support producers to continue their existing conservation system and to expand it through a whole-farm approach that results in an advanced land and resource stewardship.
- Eliminate the “double-dip” provision that permits joint operations to receive twice the statutory \$200,000 payment limit to maximize the number of farmers that can participate in the CSP.

Environmental Quality Incentives Program (EQIP)

EQIP supports producers interested in conserving and improving natural resources on their farms and ranches. EQIP participants install or implement structural, vegetative, and management practices – like improving irrigation efficiency, restoring pasture, or nutrient and pest management – on eligible agricultural land and nonindustrial private forestland. In return, through a contractual agreement, NRCS provides financial cost share assistance and technical assistance. Payments made through EQIP cover income foregone as well as costs incurred that are associated with planning, design, materials, equipment, installation, labor, management, maintenance, and training. When determining the amount and rate of payment to compensate for income foregone, USDA can give more weight to those practices that promote soil health, water quality and quantity improvement, nutrient management, pest management, air quality

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improvement, wildlife habitat development (including pollinator habitat), and invasive species management.

- Increase allocations of EQIP funds to share the cost of investment in soil health and agricultural resilience to improve long-term productivity, reduce risks from extreme weather, minimize greenhouse gas (GHG) emissions, and increase carbon sequestration.
- Prioritize NRCS' four science-based principles of soil health management: keep soil covered, maintain living roots, diversify crops, and minimize soil disturbance.
- Establish soil health and resilience to increased weather volatility as a national priority for EQIP and commit significant targeted outreach, funding, and technical assistance to support implementation for these practices.
- Prohibit the use of EQIP funding for new or expanding Confined Animal Feeding Operations (CAFOs) and reallocate at least 50 percent of EQIP funding for livestock production to support more sustainable pasture-based livestock, dairy, and poultry operations, including technical assistance and outreach for producers seeking to initiate, improve, or transition to grass-based operations.
- Conduct an analysis on the use of EQIP funds by CAFO livestock operations by practice (as is currently the case) and also by operation size and the amount of manure generated by the operation to determine the impact and efficiency of the EQIP program and help NRCS meet internal goals by ensuring that funds are encouraging sustainable, responsible, and cost effective manure management strategies.
- Revise scoring and ranking for EQIP practices and suites of practices that emphasize natural resource and environmental benefits on a site specific and priority natural resource basis, that would result in moderate or substantial improvements in the targeted priority resource concerns.
- Increase support for organic and organic-transitioning producers by establishing “new or expected resource concerns related to organic production” as a program purpose (as mandated in 2018 Farm Bill) and maintaining the separate ranking and funding pool for organic producers while increasing the contract payment limit from \$140,000 to \$450,000, mirroring the general EQIP funding pool.
- Institute a process to inform farmers about the Advance Payment Option at the time of enrollment in EQIP: advanced payment of at least 50 percent of contract for historically underserved producers including beginning, limited-resource, socially disadvantaged, and veteran producers.
- Require that states set regular, publicly posted application periods for EQIP, including a coordinated time frame for at least three deadlines - one in early winter, one in late winter, and one at the final batching date for the year - that minimizes barriers for producers seeking to apply.
- Eliminate the “double-dip” provision that permits joint operations and farms participating in water management projects to receive twice the statutory \$450,000 payment limit to maximize the number of farmers that can participate in the EQIP.

Agricultural Conservation Easement Program (ACEP)

As urban, suburban, and low-density residential development demands increase, more than 2,000 acres of American agricultural land is converted to non-farming use each day. Converting agricultural land to development results in significant increases in greenhouse gases emissions and diminishes our ability to store carbon in our soils. Ultimately, this development poses a threat to our food security and our rural economies. The Agricultural Conservation Easement Program (ACEP) helps to protect vital agricultural lands by enabling private landowners, land trusts, and other entities to preserve working farms and ranches and restore, protect, and enhance wetlands and grasslands through long-term easements. Ending the net loss of farmland to development and zeroing-out net conversion of forest, prairie, and grazing lands to cropland will entail a substantial expansion of the Agricultural Land Easement (ALE) component of ACEP and grassland conservation initiatives within ACEP, CRP, and CSP.

- Establish the national goal for farmland preservation included in the Agriculture Resilience Act (H.R. 5861) introduced by Rep. Chellie Pingree (D-ME) to reduce the conversion of agricultural land to development and grassland to cropland by at least 80 percent by 2030 and eliminate this conversion by 2040.
- Include funding for ACEP of at least \$450 million in the fiscal year 2022, increasing to \$700 million in fiscal year 2030, as provided in the Agriculture Resilience Act (H.R. 5861), in the USDA's annual budget request to the White House.

Organic Conservation Assistance

- Establish an agency-wide priority to support the widespread adoption of resource-conserving and climate-friendly organic systems through adequate and appropriate technical assistance and nationwide access to relevant conservation activities under EQIP and CSP programs.
- Maintain separate ranking and funding pools for organic and transitioning producers in both EQIP and CSP and allocate funding to states proportional to numbers and acreage of organic farms in each state.
- Conduct robust outreach to inform organic and transitioning producers of the opportunity to enroll in EQIP or CSP to receive assistance in developing an Organic System Plan and develop and implement a conservation system that meets USDA National Organic Program (NOP) requirements and producer goals.
- Build national NRCS capacity to work effectively with organic and transitioning producers, including conservation planning, program enrollment, and selection and implementation of NOP-compliant conservation activities.

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- Ensure that each State and Territory NRCS office has at least one qualified staff person designated to coordinate outreach and program delivery.
- Engage organic producers, researchers, service providers, and other stakeholders in a review of CSP, EQIP, and other NRCS programs and conservation activities for their relevance to organic systems, as well as develop recommendations for improving program accessibility to organic producers and maximizing the conservation benefits of organic systems.

Conservation Reserve Program (CRP)

- Reserve at least 800,000 acres annually and, in time, at least 8 million acres (one third of the total 24 million acre cap) in total for new and renewing continuous enrollments. In addition, all continuous sign-up practices should immediately be made eligible for Signing Incentive Payments (SIP) and Practice Incentive Payments (PIP). FSA should continue to closely monitor enrollment progress in the special wildlife (SAFE) and wetland initiatives and increase acreage allotments as needed.
- Inform landowners with expiring CRP contracts via letter one year prior to the expiration of their options to keep conservation on the land through the Continuous Conservation Reserve Program (CCRP), or to transition to grass-based production or other perennial production systems on the land through CRP-TIP, CSP, and EQIP.
- Reinvigorate the Conservation Reserve Enhancement Program (CREP) by initiating a call for new CREP proposals and working with existing CREP project sponsors to update and improve existing CREP agreements. Use the program to leverage state, local, and private dollars to improve carbon sequestration, water quality, and wildlife benefits in targeted watersheds by converting highly erodible and vulnerable cropland along streams into grass, shrubs, and woodland buffer strips.

Regional Conservation Partnership Program (RCPP)

- Expand the Regional Conservation Partnership Program (RCPP) nationally and adopt climate change mitigation and resilience as a priority resource concern within the program, increasing ranking points for project proposals that would sequester carbon in soil and biomass, reduce GHG emissions, and enhance the capacity of farms and rural areas to withstand the impacts of climate disruption. In addition to enhancing resilience of individual farms, adoption of these practices by multiple farms in an RCPP project can protect nearby communities by reducing the intensity of flooding events, protecting drinking water supplies, and sustaining food production through increased weather volatility.
- Encourage RCPP applications for projects that integrate soil conservation and soil health enhancement with the program's existing priorities in the areas of water conservation,

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water quality, and wildlife habitat and those that engage rural and urban communities within a region to address multiple goals in a coordinated and synergistic manner.

Conservation Compliance and Conservation Technical Assistance

- Publish and implement a plan to address the weaknesses in the enforcement of conservation compliance for highly erodible land and wetland, including inadequate state-level spot checks, the lack of participation by some states, and the failure to address gully erosion.
- Provide significant funding for NRCS Conservation Technical Assistance (CTA) to allow for comprehensive conservation planning across all conservation programs, to empower and support district NRCS offices to provide effective on-the-ground conservation technical assistance to producers, and to allow sufficient funding for enforcement of conservation compliance.
- Include funding of at least \$850 million for the NRCS Conservation Operations account, including for Conservation Technical Assistance (CTA), to allow for comprehensive conservation planning across all conservation programs, to empower and support district NRCS offices to provide effective on-the-ground conservation technical assistance to producers, and to allow sufficient funding for enforcement of conservation compliance in the USDA's annual budget request to the White House.

Reversing the Loss of Grasslands

- Direct FSA to collect and report annually on the number of acres by county that are broken out of native sod.
- Establish a nationwide goal to reduce the net annual conversion of forest, prairie, grassland, and permanent pastureland into cropland to zero at the earliest time possible, and no later than 2040, as stated in the Goals section of the Agriculture Resilience Act (H.R. 5861).
- Reinvigorate the Grazing Lands Conservation Initiative to support partnerships and technical assistance that promote better management and protection of grazing lands.
- Promote working lands conservation activities that convert cropland, especially depleted, highly erodible, or otherwise ecologically sensitive cropland, into permanent pasture or native prairie, wetland, or woodland vegetation.
- Expand Sod saver to cover the entire US, and eliminate, rather than reduce, crop insurance subsidies on land broken out of native prairie or grassland.

Concentrated Animal Feeding Operation (CAFO) Regulation

- Promulgate new CAFO National Pollutant Discharge Elimination System

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(NPDES) permit regulations and effluent limitation guidelines that would require CAFOs to account for and effectively control water pollution from all facilities - no longer allowing them to “self-certify.”

- Require that land application of CAFO waste for agronomic purposes be governed by a comprehensive nutrient management plan (CNMP), emphasizing dry manure handling and composting, which should be incorporated into the NPDES permit.
- Begin the process of ending the EPA exemption of CAFOs from enforcement of the Clean Air Act, the Comprehensive Environmental Response Compensation & Liability Act (CERCLA) and the Emergency Planning & Community Right to Know Act (EPCRA) to limit hazardous air emissions including ammonia, hydrogen sulfide, the powerful greenhouse gases nitrous oxide (N₂O) and methane (CH₄), and other pollutants that can damage human health and the environment.

CLIMATE RESILIENT AGRICULTURE

Farmers and ranchers across the country are battling against the devastating impacts of a changing climate as they deal with increased flooding, drought, extreme heat, damage to crops and harm to animals from shifting pest and disease pressures, and disrupted fruiting in perennial crops. The climate crisis already costs farmers, the federal government, and taxpayers hundreds of billions of dollars, and threatens our national food security and the viability of our farms and ranches. Climate associated risks will continue to worsen unless we take ambitious action to reduce greenhouse gas emissions (GHGs) and support an agricultural transformation that adapts to a changing climate.

Farmers and ranchers must be part of the climate solution. They are uniquely positioned to mitigate the effects of climate change through conservation practices that sequester carbon, improve soil health, build agroecosystem resilience, and reduce GHG emissions. Any comprehensive climate policy and multi-agency strategy should engage farmers as a key part of the solution by incentivizing more on-farm conservation, investing in sustainable and organic agriculture research, and breaking down barriers that make it difficult for farmers to diversify their production systems and adopt suites of conservation, climate-friendly practices.

As we take action to address the climate crisis, resources must reach those most at risk and all climate-focused policy must reserve a significant portion of assistance for communities most impacted by a changing climate. These are often low-income communities and communities of color that are more likely to be affected by extreme weather events due to the legacy of public policies that have clustered vulnerable communities in damage-prone areas.

NSAC strongly recommends the Administration use the Agriculture Resilience Act (ARA, H.R. 5861) as a roadmap to address climate challenges in US agriculture. The ARA establishes an ambitious, science-based goal of making US agriculture climate neutral (zero net

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GHG footprint) by the year 2040, and greatly expands investment in USDA research, extension, and conservation programs to build a truly sustainable, climate-resilient, and climate-friendly food and agricultural system. While legislative action on climate and agriculture is needed to fully realize the benefits of the ARA, the Administration should take all possible intermediate steps to support the future implementation of the ARA.

- Establish the mitigation of climate change impacts on agriculture as a national priority and the implementation of conservation agriculture practices to increase resilience and reverse climate change as a department-wide priority across all USDA programs.
- Commit to ensuring existing USDA programs and standards support farmers' efforts to mitigate and adapt to a changing climate through the adoption of specific conservation farming and ranching systems. The Administration should create a public plan that will:
 - Establish climate change mitigation and adaptation as a nationwide Resource Concern in EQIP and CSP, provide ranking and payment recognition for conservation activities that enhance agricultural resilience to weather extremes and other climate related stresses, and support practices that sequester carbon, reduce GHG emissions, and otherwise enhance soil health through synergistic system-wide combinations of perennial plantings, resource-conserving crop rotations, management intensive rotational grazing, reduced tillage, nutrient and manure management, and transition to organic production.
 - Recognize the benefits of the Conservation Reserve Program (CRP) to sequester carbon in soil and perennial plant biomass and revise the Environmental Benefits Index (EBI) used to rank and select applications to prioritize carbon sequestration, GHG mitigation, and climate adaptation benefits of the land to be enrolled in CRP plantings.
 - Begin to revise and update Crop Insurance and other Risk Management Agency (RMA) programs to take full account of new and emerging risks related to climate disruption, and the capacity of soil health and conservation systems and practices to reduce these risks by building resilience. Direct RMA, Climate Hubs, NIFA, ERS, and NRCS to collaborate in the actuarial research needed to provide the scientific basis for such programmatic revisions.

Build USDA Capacity to Coordinate Conservation and Research to Reverse the Climate Crisis

- Establish a net-zero or positive (mitigating) GHG “footprint” as a primary goal for USDA conservation program, working in coordination with USDA research and extension programs and align public investments in agricultural conservation and climate mitigation programs to develop practical, region-specific climate solutions and disseminate that information to farmers and ranchers.

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- Coordinate USDA conservation and research programs to develop and test methodologies that can quantify and document carbon sequestration, GHG reduction, soil carbon and nitrogen dynamics resulting from soil health and other conservation activities. These include the development of advanced in-field sensor technologies and real-time monitoring that may make accurate, affordable, field-scale monitoring widely available. Current models and measurement protocols cannot accurately predict the amount or durability of carbon sequestration or net GHG reduction of a particular suite of practices at a particular site making efforts to develop agricultural carbon markets, offsets, or tax credits premature.
- Establish a stronger collaboration between USDA Conservation, REE, and other Mission Areas to address the climate crisis. Hire and adequately fund REE staff in the Office of the Under Secretary to coordinate programs across the four REE agencies, NRCS, RMA, and other USDA agencies to facilitate translation of climate mitigation and adaptation research outcomes into practical, on-farm practices.
- Submit a budget to Congress that includes escalating requests for USDA funding that will result in a tripling of funding for major climate-related research and extension programs, including prominently the ARS/USFS Climate Hubs, the ARS Long-Term Agroecosystem Research (LTAR) Network, SARE Program, and Organic Transitions Program (ORG).

Transition to Pasture-Based Livestock Systems

Advanced grazing systems, such as management-intensive rotational grazing (MIG), vastly improve soil, forage, and livestock health as frequent movement of cattle to new pasture prevents overgrazing, preserves pasture plant biomass, reduces the need for tillage and replanting, maximizes soil carbon sequestration, and reduces both methane emissions from enteric fermentation and GHG emissions from wet handling of manure. Carbon sequestration and animal well-being are further enhanced when trees are incorporated into pasture systems (silvopasture). USDA must develop a comprehensive public plan to transition livestock from concentrated animal feeding operations (CAFOs) to pasture-based management practices that will:

- Develop a goal to establish advanced grazing management on all of the nation's grazing lands by 2040, and to convert two thirds of liquid manure management to alternative methods with lower GHG emissions, including dry storage, flush to scrape conversion, solid separation technologies, compost bedded pack barns, and open solar drying or on-site composting.
- Prioritize practices that support producers converting CAFO operations to more sustainable grazing-based systems within CSP and EQIP ranking tools and payment calculations, promote the Advanced Grazing Management supplemental payment, and prioritize outreach and technical assistance for advanced grazing management systems, including silvopasture and Management Intensive Grazing (MIG).

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- End federal support for the development of new anaerobic manure digesters through programs like AgSTAR. Anaerobic manure digesters have proven to be a costly remedy for reducing GHG emissions, have a poor track record in sustaining methane reductions, and do little to address other problems associated with manure management at CAFOs, including impairment of water and air quality affecting nearby communities.
 - Prohibit the use of federal loans or loan guarantees to support the development of new or expansion of existing CAFOs.
-

SUPPORTING SAFE FOOD PRODUCERS

CENTERING RACIAL EQUITY IN PROGRAM DESIGN AND IMPLEMENTATION

- Require organizations that receive FDA and USDA funding for food safety outreach, education, and training to collect demographic data on the target audience served.
- Ensure the Food Safety Modernization Act (FSMA) produce safety rule exemptions do not exclude produce grown by farmers of color by continuing to evaluate and add items to the Rarely Consumed Raw List.
- Support culturally appropriate food safety training by prioritizing applications for funding from organizations that have historically served farmers of color and people of color and by expanding the Food Safety Outreach Program collaborative engagement supplement to include a financial partnership with minority serving institutions, people of color led community based organizations, and tribal agencies.
- Commit to a Food Safety Inspection Service (FSIS) study and report to Congress on options for the handling and slaughter of amenable species including bison, yak, alpaca, llama and rabbit, on developing culturally appropriate and safe best practices, and on developing HACCP (Hazard Analysis and Critical Control Points) Guidelines for in-field slaughter of bison for intrastate commerce.
- Ensure FSIS compliance documents, HACCP resources, guidebooks, newsletters, and education and outreach materials for small plant operators and employees are available in Spanish and other appropriate languages on the FSIS website.
- Ensure the Occupational Safety and Health Administration (OSHA) website contains accurate and comprehensive safety and wage information related to meat and poultry processing plant employment and that this information is directly accessible from the FSIS website and available in Spanish and other appropriate languages.
- Collect and report demographic participation data on current and future Agricultural Marketing Service (AMS) and Rural Development (RD) programs that support small plants, such as VAPG and FMLFPP, and capture demographic data on plant owners and operators for each plant with a grant of federal inspection.

SCALE APPROPRIATE FOOD SAFETY REGULATIONS

The Food Safety Modernization Act's (FSMA) Produce Safety Rule (PSR) inspections began in 2019, and very small farms will be inspected for the first time in 2021. Overall, FDA should gather the input and feedback to ensure these regulations take into consideration the differing food safety risks of small, diversified, and direct-to-consumer farm operations. FDA should move forward with the following recommendations to ensure that these food safety regulations do not jeopardize the ability of family farms and small food businesses to thrive:

- Gather input from small and very small farms and small food businesses subject to the new FSMA rules through listening sessions, in partnership with farmer-based organizations, to guide FDA implementation of the PSR and modify inspection protocols based on stakeholder feedback.
- Withdraw the Agricultural Water Requirement portion of the PSR and commit to the rigorous research and risk assessment necessary to develop an irrigation water standard that meets FSMA's science- and risk-based requirements.
- Issue clear guidance from FDA to the State Departments of Agriculture that FDA funds shall not be used to inspect farms that are exempt from the full PSR requirements. In some states, exempt farms are being inspected. FDA should work with the State Departments of Agriculture and relevant stakeholders to determine the best approach for proving an exemption.
- Finalize a Final Guidance Document on the PSR and confirm in the Final Guidance Document that "dropped covered produce" does not include crops that are grown off the ground but that come into contact with the ground while still in production and have no signs of damage.
- Fully fund and support Local Food Safety training initiatives through cooperative agreements, including the development of the Alternate Curricula to the PSR for small, diversified farms to ensure that this sector is prepared for first-time produce safety rule inspections.
- Continue to fund On Farm Readiness Reviews (OFRRs) through the National Association of State Departments of Agriculture to help small farms facing first-time PSR inspections come into compliance.
- Continue with the current FDA and the State Departments of Agriculture approach to educate and not regulate for first-time PSR inspections.

FARMER TRAINING FOR SAFER FOOD

The Food Safety Outreach Program (FSOP) is the only competitive grants program exclusively focused on providing food safety outreach and education to small-scale farmers and processors. Specific actions to improve FSOP and ensure trainings are provided to farmers and other stakeholders include:

- A four-year plan to increase funding for the FSOP to an operating level of at least \$15 million by 2025.
- Issue the FSOP RFA during the winter to ensure ample time for farmer-based organizations to submit proposals and have programs in place during the subsequent winter farmer-training season.
- Prioritize FSOP applications from organizations that work directly with farmers to ensure appropriately tailored and accessible outreach, training, and technical assistance.
- Restructure funding for the Regional Centers to ensure only one or two regional centers receive funding each fiscal year to better balance the needs of other grant applicants who apply each fiscal year.

As FDA's new food safety rules come into effect, farmers are facing simultaneous regulatory and market pressure to obtain food safety certification. It is critical that USDA's investment in local food system development be protected and leveraged by supporting farmers that are seeking food safety certification individually or collaboratively with other farmers, and that USDA reduce the burden of increased USDA Good Agricultural Practices (GAP) and Good Handling Practices (GHP) certification costs for small and very small producers. The Administration should:

- Ensure GAP fees remain consistent and reasonable, so small farms can continue to pursue annual audits.
- Expand the GroupGAP certification option, and work closely with stakeholders to promote, evaluate, and continually improve USDA GAP and GroupGAP.
- Delay alignment of the USDA GAP water standard with the new Produce Rule water standard until all farmer compliance dates are in effect and/or FDA has provided clarity on the use of alternative standards through guidance.
- Include as a priority for Specialty Crop Block Grant funding food safety training and certification cost-share proposals.

FIXING A BROKEN SUPPLY CHAIN

Small and mid-sized producers need small scale poultry plants to help them reach their customers and are a vital link in every regional food supply chain. Unfortunately, there are too few appropriately sized, independent meat processing facilities in some areas of the country,

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which leads to bottlenecks within the overall supply chain. This problem was made even more obvious during the coronavirus pandemic forcing some small producers out of the industry even as consumer demand for their products rose. There must be support to expand small-scale slaughter and processing plants to help increase farmers' and ranchers' access to slaughter. The Administration should recognize small and very small meat and poultry plants as essential infrastructure and help producers and entrepreneurs meet the demand for sustainable, organic, pastured-based, humanely produced, locally and regionally produced meat and poultry products by ensuring the following recommendations are implemented by the USDA Food Safety Inspection Service (FSIS).

- Ensure the National Advisory Committee on Meat and Poultry Inspection has at least an equal number of independently owned, small plant stakeholders serving on the Committee as the largest meat and poultry companies. There should also be at least one farmer or rancher that utilizes small scale slaughter plants for their products on the committee.
- Create an implementation plan based on the recommendations in the study commissioned in the 2018 Farm Bill on “USDA FSIS Guidance and Outreach to Small Meat Processors” written by the Niche Meat Processor Assistance
- Network, Oregon State University and commit to implementing this plan by 2025.
- Further strengthen relationships with the regulated community by continuing to support FSIS officials' participation in Small and Very Small Plant Roundtables in partnership with organizations that work directly with small plants with a special focus on dialogue with small plants with fewer than 150 employees.
- Work to increase the number of small plants that have a grant of federal inspection, and continue to support the small plants that are federally inspected:
 - Continue past dialogues around the need for more state inspected plants gaining federal inspection status and allow state inspected plants to be federally inspected on a specific day(s) of the week, depending on the capacity and needs of the small plant.
 - Begin a dialogue with states that are eligible, but not yet a part of the Cooperative Interstate Shipment (CIS) program to expand farmers and ranchers market options. FSIS should develop a report on the effectiveness of CIS including any barriers or issues with CIS in certain states and share this information with the House and Senate Agriculture Committees.
 - Create a team of trained inspectors, Enforcement, Investigations, and Analysis Officers, and Public Health Veterinarians that understand charcuterie and cured meats to lead the development of guidelines for small and very small plants that comport with existing regulations, are understandable to a plant operator, and can be implemented within the context of a HACCP system.

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- Allow inclusion of all variety meats without Specified Risk Materials into a HACCP plan that outlines variety meat processing, regardless of which variety meats are actually listed.
 - Commit to a four-year plan to reduce small and very small plant overtime fees by requesting the funds needed to completely reduce fees for very small plants and reduce fees by 75% for small plants by 2025.
 - Publish a proposed rule for comment that ensures a transparent and accurate 'Product of the USA' label for livestock born, raised, harvested, and processed in the U.S. to ensure consumer confidence and support local producers and processors.
-

SCIENCE THAT SERVES FARMERS

CENTERING RACIAL EQUITY IN PROGRAM DESIGN AND IMPLEMENTATION

- Expand NIFA capacity building grants for Black, Indigenous, People of Color (BIPOC) farmers within key NIFA programs that offer grants for capacity building such as: the Farming Opportunities Training and Outreach program, the Sustainable Agriculture Research and Education (SARE) program, and the Gus Schumacher Nutrition Incentive Program (GusNIP).
- Require non-industry stakeholders, including academic or non-academic research institutions, non-profit organizations, and organizations that represent women, Black, indigenous, and people of color farmers, and alternative food system stakeholders, are fully engaged in USDA policy and program decisions.
- Ensure that USDA research is equitable and complementary to, and not duplicative of, research supported by the Foundation for Food and Agriculture Research (FFAR) and advances USDA's mission at both FFAR and USDA to conduct research that benefits all people, including BIPOC individuals.
- Direct a dramatic increase in climate adaptation and mitigation funding towards 1890 Institutions, Hispanic-Serving Agricultural Colleges and Universities, and Tribal Colleges and Universities to provide solutions that help historically underserved communities not only mitigate and adapt to climate impacts, but prosper economically.
- Focus Extension resources towards 1890 institutions, 1994 tribal colleges and universities, and underserved and marginalized communities to address the reprehensible civil rights record of the Cooperative Extension System (CES) as documented by numerous investigations, lawsuits, and congressional hearings. Since being reorganized under NIFA in 2009, the CES has made improvements but still lacks diversity in staff and too often fails to meet the needs of underserved populations, particularly farmworkers and non-white farmers.

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- Increase emphasis on diversity in the evaluation of applicants for USDA extramural peer review panels and federal advisory committees (i.e. National Agricultural Research, Extension, Education, and Economics Advisory Board (NAREEEAB) with particular priority extended to applicants who, individually or through their organizational affiliation, represent women, Black, Indigenous, Hispanic, Asian, or other racial and ethnic group that identifies as non-white farmers or communities.
- Commit to research on the impacts of climate change on farmers of color, farmworkers and food system workers, members of low-income communities, and how public investment can restore racial equity and environmental justice, mitigate climate change impacts, and build resilience for vulnerable communities.
- Obtain Baseline Diversity, Equity, and Inclusion (DEI) data on grant applicants with the goal of producing more equitable funding outcomes.

RESTORING RESEARCH CAPACITY

Research underpins the success of any farming operation and remains the key driver in creating a more just, sustainable, resilient, and profitable food and farm economy into the future. Decades of declining and inadequate publicly funded agricultural research has hindered the nation's ability to transition to a more resilient food and agricultural system that is able to mitigate further disruptions and adapt to changing resource threats. The gap that exists between the demand for farmer centered agricultural research and the available federal funding has been partially filled by the private sector but their profit driven research agendas have led to increased consolidation, an ever greater reliance on synthetic inputs, fewer seed choices for producers, and a focus on maximum crop yields without consideration for the externalized costs to farmers, farmworkers, and the planet.

An ill-conceived and poorly executed relocation of the Economic Research Service (ERS) and National Institute of Food and Agriculture (NIFA) to Kansas City, Missouri, led to an exodus of 75% of agency research expertise, greatly eroding the technical capacity and hindering the ability of both agencies to conduct critical food and agriculture research and administer grant programs that are vital to helping farmers adapt to a rapidly changing climate. USDA must commit to restoring its vital research capacity and create a transparent plan, built with the input of a diverse range of key stakeholders to:

- Develop a plan to rebuild and advance REE science capacity that defines the agencies major strategic and tactical goals for the upcoming years, assesses talent and trends impacting availability of needed expertise, analyzes the current state of function of the agencies, conducts a gap analysis, and develops a plan for implementing program or policy changes.
- Return NIFA and ERS science-program leadership positions to Washington, DC, where staff are best able to work with and inform policymakers in accordance with their mission.

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- Preserve ERS as part of the REE mission to retain the organizational firewall between the Office of the Secretary and the Office of the Chief Economist.
- Restore full competition to the Agriculture and Food Research Initiative (AFRI) by allowing individuals, colleges and universities, private and non-profit organizations, government agencies, and other research institutions to apply for both integrated and single function projects as is required in statute and reform the grant review panels to include representation from nonprofits and other eligible applicants that have been previously excluded.
- Submit budget requests to Congress to provide funding that will permit ERS and NIFA administrators to quickly hire back staff so they can at minimum operate at their pre-relocation capacities and expand staff capacity to support urgently needed research areas, such as agroecology, interdisciplinary social science, human nutrition science and policy, and climate change.
- Submit budget requests to Congress to provide funding to address the backlog in maintenance, repairs and renovations needed to undertake critical agricultural research in ARS and other federal research facilities.
- Submit budget requests to Congress to provide funding for NASS to conduct a comprehensive survey and study of urban agriculture.

Agroecological Research to Help Farmers Adapt to and Mitigate Climate Change

Federally funded research on agroecological systems - which feature farming practices that work with nature, that reduce greenhouse gas emissions, increase carbon sequestration in soil, and improve efficiency for all farms size - must be a priority if we are to guide our food systems towards greater ecological sustainability, financial stability, and social equity. Organic farming and ranching, agroforestry, advanced grazing management, and silvopasture have shown potential to enhance resilience, sequester carbon, and mitigate greenhouse gas emissions and other environmental impacts, and merit additional research to fully realize this potential.

Private sector research funding has led to processes and products that can provide profits for investors, while the public sector funds more foundational research and development with practical outcomes that can reduce reliance on purchased inputs like fertilizer and pesticides, promote ecosystem services, or result in innovations that cannot easily be commercialized. Public support for agroecological research that supports the optimization of the balance among production, environmental services, and socio-economic sustainability, rather than maximizing yield and efficiency alone, should be the goal of federally supported agricultural research.

- Prioritize climate change mitigation and adaptation agricultural research, which spans disciplinary boundaries and includes agroecological, applied economics, integrated human nutrition science and policy, and system science principles across REE agencies.

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- Establish soil health and agricultural resilience to climate change and other stresses as research priorities within all NIFA competitive grant programs and fund proposals for innovative, systems-based approaches to improving the physical, chemical, and biological condition of soils, optimizing soil capacity to sequester carbon, minimize nutrient losses, absorb rainfall and hold plant available moisture; suppress plant disease and enhance crop vigor.
- Prioritize climate change mitigation and adaptation within the Sustainable Agriculture Research & Education (SARE) program to offer farmer-driven grants and programming to improve farmer access to knowledge and resources to build climate resilience.
- Establish soil health and agricultural resilience to climate change and other stresses as national research priorities for the Agricultural Research Service (ARS) Long Term Agroecosystem Research (LTAR) Network to enhance efficacy and wider applicability of outcomes. The LTAR Network uses experimentation and coordinated observations from 18 locations across the country to develop a national roadmap for the sustainable intensification of agricultural production.
- Use USDA data collection instruments – such as the Census of Agriculture or the Agriculture Resource Management Survey (ARMS) – to collect additional information on the prevalence of agricultural practices that can mitigate heat trapping emissions or that help farmers adapt to climate change, including practices that preserve soil health (such as cover crops, agroforestry, perennials, advanced grazing management and conservation crop rotations).
- Create a public breed and cultivar research coordinator position within the REE mission area to ensure that USDA can continue to maintain and build a diversity of crops and livestock breeds with climate-adaptive and other beneficial traits that are broadly accessible to all US farmers.
- Increase priority and funding across NIFA competitive grant programs for agroecological research and systems-based approaches to mitigating the impacts of the climate crisis on farms and rural communities, including:
 - Sustainable Agricultural Systems (SAS) Program
 - Bioenergy, Natural Resources and Environment (BNRE) Program Area
 - Agriculture Economics and Rural Communities (AERC) Program Area
 - Critical Agricultural Research and Extension
 - Data Science for Food and Agriculture Systems
- Reform the SAS program to shift funding from technological solutions for inherently unsustainable, low-resilience production systems towards agroecological approaches such as agroforestry, organic and regenerative production systems, advanced grazing management, silvopasture, and crop and livestock integration
- Establish a budgetary plan with a goal of reaching \$1 billion in discretionary funding for NIFA competitive programs by FY 2024 and submit USDA's annual budget request to the White House to meet that goal. This should include scaled up funding for publicly funded agricultural research to achieve:

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- AFRI at \$700 million per year
- SARE fully funded at \$60 million per year
- Long Term Agroecosystem Research (LTAR) Network at \$50 million per year
- Organic Transitions Program (ORG) at \$20 million per year

Plants and Animals for a Changing Climate

Plant and animal breeding have been core functions of our nation's Land Grant Universities (LGU) since their founding, but as federal funding has diminished and shifted from formula-based toward competitive funding, our nation has lost nearly half of our public breeding capacity over the course of a few decades. The potential for plant and animal breeding to address daunting challenges in agriculture is great but we must strengthen plant breeding programs in every state to quickly deliver regionally adapted cultivars to farmers. Improving our plant breeding infrastructure, elevating and collaborating with the growing seed and food sovereignty movements, and delivering crops that can adapt to and mitigate the consequences of climate change must be a USDA priority.

- Create a separate AFRI Request for Applications on Public Cultivar and Breed Development for new breeding projects, with priority given to proposals using farmer-participatory, on-farm plant and animal breeding, and cultivar and breed evaluation to expedite the adoption of new seeds and breeds. The peer review panel for this RFA should include plant breeders with a demonstrated track record in public cultivar development. Since proposals often involve local, indigenous, and/or heirloom varieties, panels should include representation of BIPOC communities who preserve these crops.
- Launch a department-wide public plant and animal breeding initiative that prioritizes the cost-effective development and timely release of regionally adapted cultivars and livestock breeds that meet producer and market needs and support the stewardship of seed, soil, and other natural resources. The administration should establish a White House Office of Science and Technology Policy Liaison for Public Breeding, and USDA's Research, Education, and Extension Office (REEO) should coordinate public plant and animal breeding activities within and between REE agencies and in coordination with the National Genetic Resources Advisory Council (NGRAC).
- Elevate stakeholder voices to identify and prioritize breeding needs by holding a stakeholder listening session within the first 100 days of the administration to establish goals for the department-wide public plant and animal breeding initiative.
- Require USDA to swiftly act on Farm Bill directives for its National Genetic Resources Advisory Council (NGRAC). NGRAC is charged with conducting a strategic assessment of public germplasm collections and cultivars and developing a plan that takes into consideration the resources and research necessary to keep our national germplasm collections viable and accessible.

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- Ensure that any landrace or heirloom germplasm collected from traditional agricultural systems led by Black, Indigenous, Latinx, Asian, and other communities of color – or from Indigenous communities anywhere in the world – are obtained only with informed and uncoerced permission. This germplasm should only be used for public cultivars unencumbered by intellectual property rights and these requirements should be communicated in RFAs and in contracts with awardees. The source communities should also be equal partners in the breeding and selection process to ensure they receive full benefit from their contributions.
- Submit USDA's annual budget request to the White House to support these public plant and animal breeding priorities including:
 - Separate AFRI Request for Applications on Public Cultivar and Breed
 - Development at \$10 million per year
 - ARS public breeding and cultivar development competitive programs and intramural research at \$50 million per year

Sustainable Agriculture Research and Education (SARE)

The SARE program is the flagship research program for sustainable agriculture and the only farmer-driven, competitive research grant program at USDA. Through its regional Administrative Councils, it provides Research and Education Grants, Professional Development grants, Producer grants, Graduate Student grants and other small grants for sustainable agriculture research. Demand for this type of research support is exceptional and so outpaces available funding that the success rate for grant awards is very low - currently for Research and Extension grants the success rate is around ten percent - and clearly more resources are warranted.

- Increase representation within each SARE regional Administrative Councils (AC) by requiring that each include two NGO representatives to ensure equitable engagement and participation of farmer supporting voices and prioritize funding for farmer-researcher collaborations on soil health management practices, agroforestry, advanced grazing management, and other production, conservation, and business management strategies to enhance resilience, sequester carbon, and mitigate GHG emissions.
- Submit USDA's annual budget request to the White House that supports these priorities and includes:
 - SARE fully funded at \$60 million per year
 - SARE Agriculture and Food Systems Resilience Initiative at \$50 million per year
 - SARE Professional Development Program at \$30 million per year

Organic Research for a New Century

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Research over the past 20 years has verified that organic farming and ranching systems can enhance soil health, protect water and other resources, contribute to climate change mitigation and resilience, and open new economic opportunities for producers to meet consumer demand. Organic agriculture has grown into a multi-billion dollar industry over the last two decades and remains today one of the fastest growing sectors in agriculture. Although USDA investment in organic research, including public cultivar development for organic systems, has grown substantially since 2002, it still lags far behind the robust consumer demand for organic agricultural products. The benefits of organic research extend far beyond the organic sector and can help all farmers to build soil health, improve pest management, and enhance yield stability while reducing production costs and environmental impacts.

- Reinstatement of the Department-wide Organic Coordinator to ensure that USDA organic research addresses priorities identified through the work of the National Organic Program (NOP), the Risk Management Agency (RMA), the Natural Resources Conservation Service (NRCS), the National Agricultural Statistics Service (NASS), and other agencies; and that research outcomes inform the work of these agencies.
- Prioritize greater data integration for NASS and the Agricultural Marketing Service (AMS) organic production data to assist RMA with the development of risk management products for organic producers such as Whole Farm Revenue Protection (WFRP) and NRCS with the implementation of conservation programs and practices in organic systems.
- Develop a publicly available, searchable database of all OREI and ORG research projects, similar to that of the SARE program, and provide links to major outcomes for each project to increase farmer adoption rates of research innovations in organic agriculture, and to support and guide additional research in organic agriculture.
- Submit USDA's annual budget request to the White House that supports these priorities and includes:
 - Total USDA funding for organic research of \$220 million per year - commensurate to the market share for organic products (nearly 6%).
 - ORG program discretionary funding increasing to reach \$20 million per year by FY 2027.

RESEARCH TO RESPOND TO AND RECOVER FROM THE CORONAVIRUS PANDEMIC

Battling the coronavirus global pandemic requires the complete engagement of the science community that includes USDA working alongside its sister federal agencies, the National Science Foundation (NSF), the National Aeronautics and Space Administration (NASA), Department of Energy (DOE), the National Institutes of Health (NIH). USDA research can play a powerful role in protecting all of us from coronavirus and its impacts, and ultimately save lives and livelihoods. USDA's National Institute of Food and Agriculture (NIFA) has a long history of harnessing the immense scientific power of the nation's universities and colleges to drive our understanding of rapidly emerging and re-emerging infectious diseases and provide timely solutions to curb their impact.

Additional research, education and extension initiatives across the USDA are also crucial to understanding and communicating challenges and opportunities across the food and farm system. Such efforts are essential in rapidly changing and uncertain times, and necessary to enabling and supporting resiliency. Immediate, real-time research, using community participatory research methods as well as longer term studies, is needed now to ensure that all participants and sectors in the agricultural system – farmers, farmworkers, grocery stores, local and regional food markets – is able to adapt to and recover from the health and economic impacts of coronavirus.

- Require the Economic Research Service (ERS) and other REE programs to assess agronomic, economic, social, and food-supply chain issues arising as a result of coronavirus including impacts on food safety, food prices, household food expenditures, food insecurity, utilization of nutrition assistance programs, farm prices, farm family incomes, and planting and other management decisions that are being driven by the pandemic.