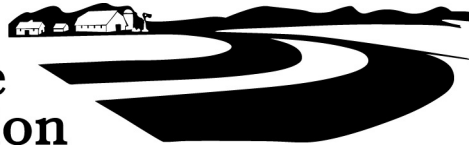


Sustainable Agriculture Coalition



September 19, 2008

Colien Hefferan
Administrator, Cooperative State Research, Education, and Extension Service
Room 305-A, Administration Building
1400 Independence Ave., SW
Washington, DC 20250

Re: USDA Listening Session on AFRI -- CSREES-2008-0002

Dear Ms. Hefferan:

Thank you for the opportunity to provide written comments regarding AFRI implementation on behalf of the Sustainable Agriculture Coalition (SAC) pursuant to “Cooperative State Research, Education, and Extension Service Solicitation of Input From Stakeholders Regarding the Establishment of the Agriculture and Food Research Initiative (AFRI)” (73 Fed. Reg. 50926). These written comments supplement a SAC presentation at the September 10, 2008 USDA listening session. SAC represents 33 family farm, rural development, conservation and environmental organizations from around the U.S. that share a commitment to federal policy that promotes sustainable agriculture production systems, family-based farms and ranches, and healthy, vibrant rural communities.

New or Expanded National Programs

Congress developed the new AFRI by melding together the National Research Initiative (NRI) and the Initiative for Future Agriculture and Food Systems (IFAFS). A large amount of the previous two statutes remain in the new legislation. One of the keys to effective implementation of AFRI is therefore to continue with what remains the same, but to provide new national programs for the handful of new priority areas that are added by the new farm bill.

Congress added 5 new subject areas in AFRI beyond what was specifically mentioned in either the NRI or IFAFS statutes. We believe at least three of those should be made new national program areas, with the other two receiving added weight in existing national programs. In that light, we make the following recommendations:

1. Establish two new national programs for conventional plant and animal breeding beginning with the FY 09 RFA and throughout the coming years.

AFRI includes priorities areas for both plant and animal conventional (classical) breeding:

conventional breeding, including cultivar and breed development, selection theory, applied quantitative genetics, breeding for improved food quality, breeding for improved local adaptation to biotic stress and abiotic stress, and participatory breeding

Congress went on to explain in the conference report:

The Managers are aware of the importance of supporting public sector conventional plant and animal breeding, as evidenced by the specific mention of this priority under the “plant health and production and plant products” and “animal health and production and animal products” priorities in AFRI. The Managers intend that the term “conventional breeding,” also known as “classical breeding,” refer to breeding techniques which rely on creating an organism with desirable traits through controlled mating and selection. Because conventional breeding is critical to the development of seeds and breeds that are well adapted to local conditions and changing environmental constraints, these efforts are important to the food and agriculture sector. The Managers are aware that participatory breeding programs, where producers are involved in the process of developing new plant varieties and animal breeds, yield varieties and breeds that are better adapted to local environments. The Managers encourage an emphasis on funding of conventional plant and animal breeding as part of the new AFRI.

We are pleased this critically important and vastly under-funded area of research has been included as a new priority area and urge the agency to make it a major new thrust through the establishment of two new national programs. As mentioned again below, we also urge that the RFA for these two new national programs provide for some opportunity for longer term grants of up to 10 years where appropriate.

2. Create a new rural entrepreneurship national program within AFRI beginning if necessary as a subset of the rural development program in the next RFA but then a stand alone national program in FY 10.

The new farm bill specifies rural entrepreneurship as a focus in overall AFRI rural development portfolio, under the Agricultural Economics and Rural Communities area.

Congress went on to explain in the conference report:

The Managers are aware of the need for integrated research, extension, and education activities to stimulate entrepreneurship across rural America to support business development, improve skills of current and emerging entrepreneurs, expand access to capital, and build entrepreneurial networks. Under the priority area of “agriculture economics and rural communities,” AFRI includes “rural entrepreneurship” to increase competitive funding for integrated entrepreneurship activities. The Managers intend for this priority area to include both agricultural and rural development ventures, including strengthening non-farm, self-employment for farm and rural populations.

Estimates are that 1 in 3 rural Americans will be self-employed by the year 2015. To survive and thrive, this growing component of the rural economy must have ready access to high quality research, education, and technical assistance support systems. These systems will allow communities to create the foundation for building vibrant economies that utilize local, state, and regional assets in an effective and sustainable manner. The new program should be an integrated program area, and should include both sustainable agricultural and non-agricultural small and micro business development and include a particular focus on the growing arena of “green jobs.”

3. Take steps to ensure there is a major focus on renewable energy and on domestic marketing, including local and regional food systems, in the RFAs for ongoing national programs in the Natural Resources and Environment area and the Agriculture Economics and Rural Communities area, respectively, and elsewhere as appropriate.

The only other new farm bill AFRI additions to the priorities not already included in either the NRI or IFAFS language were the inclusion of “**renewable energy**” -- added to the title of the Natural Resources and Environment area -- and “**domestic marketing**” -- added to the overseas marketing item under the Agriculture Economics and Rural Communities heading. We commend Congress for these additions and would certainly not oppose them being added as new national programs, though we think they could also be adequately reflected by new or enhanced foci within existing national programs.

Continuing SAC Priorities

1. Small and Medium-Sized Family Farms - We are very pleased that Congress chose to carry over and continue the previous IFAFS and NRI Integrated priority area for “*farm efficiency and profitability, including the viability and competitiveness of small and medium-sized...operations.*”

We urge you to continue, and expand, the current program on Agricultural Prosperity for Small and Medium-Sized Farms. We support a continued focus on integration of economic and environmental sustainable agricultural development, value-added and entrepreneurial agriculture, and land tenure and land use change. We also support further development and expansion of an emphasis on new markets, new value chains, and renewal of food-based enterprises serving small and medium-sized farms and sustainable agricultural development. We also believe it is time to add a policy research component to the program.

While keeping and expanding this important national program, we also urge you to do more to integrate the small and medium-sized farm priority area within all other relevant national program areas and granting categories.

2. Managed Ecosystems – We also strongly support continuation and expansion of the managed ecosystems national program area, including but not limited to the current emphasis on developing and using multifunctional agricultural production management strategies. We recommend the addition of an emphasis on development and use of sustainable low carbon-based energy, high efficiency agro-energy systems. Also within Managed Ecosystems, or as a separate program if possible, we urge you to include a request for projects to develop and verify

adaptive conservation and environmental management models, including tools for measurement, valuation, monitoring and evaluation, to assist in the development of outcome or performance-based conservation and environmental programs and markets. This is an area where state and federal programs and private markets, worth billions and billions of dollars, are getting considerably ahead of the science, and a major investment is needed just to play catch-up.

Grant Terms

The new farm bill lengthened the maximum grant term from up to 5 years to up to 10 years.

Congress went on to explain in the conference report:

The Managers intend that most program areas within AFRI would have grant terms of short duration. However, the Managers are aware that there are areas of research where longer-term grants are needed, such as conventional plant and animal breeding, environmental research, and nutrition research. The Managers expect the Secretary to use 10-year grant terms only when it is critical for long-term systems research.

We recommend that you allow for longer term grants for conventional plant and animal breeding and for long-term agro-ecological systems trials beginning immediately and then begin a review process to determine if other areas of the portfolio might require the expanded grant term. However, we urge you to retain the not greater than 5 years as the default setting or norm. We believe the Statement of the Managers makes it clear that the longer grant term was to be the exception, not the rule.

Integrated Programs

We strongly support the decision of Congress to require that at least 30 percent of AFRI funding each year be for integrated projects that combine research, education, and/or extension components. This is consistent with repeated Administration budget request proposals and superior to percentages established in earlier appropriations acts.

We urge you to treat the 30 percent for what it is -- a minimum, not a maximum. Clearly there is an important place for purely research projects, but often there are missed opportunities for education or extension and outreach components which ultimately weaken the outcomes and downgrade the return on the public investment. Likewise, there is no doubt a place for education-only or extension-only projects. But for all the potential single factor proposal areas, we urge you to be cautious and not let prime opportunities for better integration be passed over simply because investigators would rather stay inside their particular box.

Pursuant to Section 406

We urge you to define the “pursuant to section 406” reference in the farm bill for what it clearly was intended to be, namely a reference for defining the nature of integrated activities. It is totally illogical for USDA legal team to hold that it means Congress intended it to mean that 30 percent or more of AFRI funding was to be transferred to other programs, especially after having

representatives in the room when the language was put together. We object in the strongest possible terms to a bifurcated RFA. We believe it sends a very bad signal with respect to the role of integrated programs and projects. We urge you to do whatever it takes to issue a unified program announcement and RFA.

Funding Levels

SAC pushed for and endorsed the decision of Congress to make the previous authorizations for NRI and IFAFS additive in developing the \$700 million authorized funding level for AFRI. We also concur with the report language, which states:

The Managers expect that in providing an annual authorization of appropriations of \$700,000,000 that AFRI will receive substantial funding to carry out its purposes in the annual appropriations process. NRI and IFAFS have been consistently underfunded despite the growing list of identified needs in agricultural research, extension, and education.

The Managers created AFRI to enhance the work funded by NRI and IFAFS. As such, AFRI should receive the combined level of authorized and mandatory funding that NRI and IFAFS, respectively, were to receive in previous fiscal years. The Managers expect that AFRI be funded at increasing levels each fiscal year to meet identified priority agriculture research, extension and education demands.

We were frankly shocked and dismayed that very significant segments of the agricultural research community chose to begin this last farm bill process by ceding farm bill mandatory funding for the IFAFS program. We work on many farm bill titles and can say with certainty that there is no other interest community for any other title of the bill that does not act first to preserve, and then increase, its baseline spending. We are extremely disappointed with many of the key partners in the research title debate. That said we need to move on from here and work together to move the ball forward with the pure appropriations route that is left to us, and we intend to seek out partners to do just that.

Thank you for taking our views into account as you develop the new RFA. We will be commenting separately on the new interim regulations for competitive and non-competitive programs.

Sincerely,

Ferd Hoefner

Ferd Hoefner
Program Director
Sustainable Agriculture Coalition