



Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

AFRI

Competitive Programs (CP) Unit
Cooperative State Research, Education, and Extension Service
U.S. Department of Agriculture
STOP 2240
1400 Independence Avenue, SW.
Washington, DC 20250-2240.

CSREES-2008-0002

Comments prepared by Brise Tencer, Washington Representative for Food and Environment of the Union of Concerned Scientists to USDA CSREES regarding the AFRI stakeholder meeting.

The Union of Concerned Scientists (UCS) is providing these comments on the Agriculture and Food Research Initiative (AFRI), created in Section 7406 of the Food, Energy, and Conservation Act of 2008. The stakeholder meeting, which dealt with the merger of the National Research Initiative and the Initiative for Future Food and Agriculture Systems into the new AFRI, was held September 10, 2008.

Established in 1969, UCS is a leading science-based nonprofit working for a healthy environment and a safer world. UCS combines rigorous scientific analysis, innovative policy development, and effective citizen advocacy to facilitate changes in public policy, corporate practices, and consumer choices and to achieve practical solutions to some of the world's most challenging environmental and security problems. UCS has created a unique alliance among leading scientists and more than 250,000 committed citizens.

For more than 15 years, UCS's Food and Environment Program has provided leadership to advance scientifically sound and practical U.S. agriculture policy solutions. We promote the adoption of practices that are good for farmers, rural communities, and the environment and that will meet the environmental, economic, and public health challenges of the 21st century.

UCS is generally supportive of the merger between the National Research Initiative (NRI) and the Initiative for Future Food and Agricultural Systems (IFAFS) in AFRI. We are particularly pleased with the broad eligibility criteria for research grants funded through AFRI. We also support Congress's giving the Secretary authority to direct grant funds to small, mid-sized, and minority-serving institutions previously unsuccessful in obtaining competitive grants.



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Integrated research

We believe that multidisciplinary, integrated research is an integral part of AFRI and should be included in the same Request for Proposals (RFP) as fundamental research. In creating this new program, congress dictated that no less than 30% of funding should be spent on integrated research. We want to emphasize that 30% is the minimum, not the maximum amount that should be spent on integrated research priorities.

Length of the awards

We support extending the grant terms of selected awards to 10 years. At the same time, we are concerned that too many grants made to projects that extend for ten years will quickly drain program resources. We believe that classical breeding (referred to as conventional breeding in the authorizing legislation) is an area of research that can especially benefit from the ten year grant terms and should be given priority in awarding such grants

Matching Fund Requirements

Although we believe that matching fund requirements can be an important way of augmenting limited research funds, we support limiting the matching fund requirement to projects that are commodity specific and do not have a national scope/benefit. Research that benefits public goods, such as clean water or air, carbon sequestration, and biodiversity are by nature national in scope.

Priority Areas

UCS is supportive of the six new priority research areas:

- plant health and production and plant products
- animal health and production and animal products
- food safety, nutrition, and health
- renewable energy, natural resources, and environment
- agriculture systems and technology
- agriculture economics and rural communities

We urge however, that important existing research areas such as *small and medium sized farmer and managed ecosystems* continue to be prioritized and expanded. Of the new research areas Congress directed be included in AFRI, we think the *conventional plant and animal breeding* and *renewable energy* are particularly important.



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Plant and Animal breeding

Dwindling resources for public plant and animal breeding has narrowed the base of crop and livestock germplasm. Both from an ecological standpoint and food safety perspective, a loss of diversity in our agricultural systems undermines the overall resilience of agricultural systems and undercuts our capacity to develop regionally adaptive varieties. We strongly urge you to prioritize grant opportunities for public plant and animal breeding.

Due to the significance and urgency of such research, both classical plant and animal breeding should become national program areas, funded at no less than \$10 million per year. Because of their complexity, grants that last up to ten years should be available to classical breeding projects, though we strongly support mid-way reviews of all longer term research grants.

The development of public germplasm provides multiple public benefits to our agriculture and environment. Matching fund requirements should be waived or made flexible for public plant or animal breeding research. Lastly, in evaluate the effectiveness of resources going to public plant and animal breeding, it is important to track research projects and expenditures going to conventional/classical breeding and those involving genomics separately.

Antibiotic related research

Antibiotic-resistant disease has been identified by the Centers for Disease Control as the number one public health challenge in the United States. Massive use of medically important antibiotics like penicillin and tetracycline in food animal production is a significant contributor to this problem. Research to develop animal production systems less dependent on antibiotics would help American producers reduce the use of antibiotics, add consumer value to their products, and position themselves advantageously in the global marketplace.

We hope this important public health issue will be addressed by AFRI sponsored research. The 2008 Farm Bill created a new competitive research program to address the animal uses of antibiotics- Section 7317, *Research and Education Grants for the Study of Antibiotic-Resistant Bacteria in Livestock*. No mandatory money was provided for this program, but the managers' statement made clear that other competitive research programs addressing animal health and water quality can and should include such research:

The Managers are aware that resistance to antibiotics is a serious and growing public health concern in the United States and around the world. The Managers intend that section 7521 of this Act provide the necessary research and information for livestock producers as well as the general public to minimize the use of such drugs while still ensuring healthy animals and people. The Managers encourage the



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Secretary to fund research that can minimize the development and spread of antibiotic-resistant bacteria and to make this a priority research area within relevant competitive research programs, including national programs related to animal production and water quality.

We believe the AFRI RFP should include research projects that would address:

- movement of antibiotics and antibiotic resistance traits from animal confinement facilities into ground and surface waters
- livestock management and practices that ensure animal health and reduce use of antibiotics
- methods to transition to practices and systems that minimize antibiotic use

We appreciate the opportunity to provide comments on AFRI and look forward to continuing to work with the agency on implementation of this exciting research program.