



ORGANIC FARMING RESEARCH FOUNDATION

fostering the improvement and widespread adoption of organic farming

To: Heather M. Pichelman,
Agricultural Marketing Service, Specialty Crops Program, USDA
1400 Independence Avenue, South Building, Room 4636
Washington, DC 20250.

From: The Organic Farming Research Foundation and partners

Re: Comments responding to Request for Information Specialty Crops Competitiveness Initiative, Federal Register, Vol 88, No. 216, pages 77257-58, November 9, 2023. **Doc. No. AMS-SC-23-0073**

Dear Ms. Pichelman,

I am writing to provide input on behalf of the Organic Farming Research Foundation in response to the Request for Input on the Specialty Crop Competitiveness Initiative (SCCI), [Doc. No. AMS-SC-23-0073]. We appreciate the USDA's efforts to seek input from impacted communities across the specialty crops industry to better understand how administrative support can enhance the competitiveness of specialty crops at every level of our food system. In this context, OFRF wants to emphasize the importance and crucial role of research in achieving the goals of the SCCI and promoting the sustainability and growth of the specialty crops industry.

1) Introduction

OFRF has been working on the widespread adoption and improvement of organic agriculture systems since its inception in 1990. We aim to do this through directly engaging in research, providing free education materials, and engaging in advocacy to ensure public support for organic research and the sector at large. Our work includes in-depth analysis of USDA funded organic research, practical educational materials to help organic farmers and ranchers apply the outcomes of that research, and surveys of organic producers to identify current research needs, as well as our small-grant program that has funded more than 300 farmer-led projects since 1990.¹

While US organic farmers and ranchers produce a wide range of crop- and livestock-based commodities, specialty crops play a major role in the organic sector. Many organic farms in the US manage highly diversified agroecosystems that feature multiple vegetable, fruit, and/or other specialty crops that represent the majority of their farmgate income. Organic market shares for domestically produced fruits and vegetables are higher than for other commodities such as field

¹ Research Database | Organic Farming Research Foundation, <https://grants.ofrf.org/> (last visited Mar. 1, 2024)



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crops, beef, and pork.² A robust SCCI will play an important role in the success of organic producers.

Research plays a pivotal role in developing our understanding of agronomic and economic benefits in agricultural production systems. It is a key driver of innovation, providing essential knowledge for improving production practices, reducing costs, and enhancing overall industry competitiveness. Our emphasis on the role of research is grounded in the profound insights derived from the [2022 National Organic Research Agenda \(NORA\)](#), an extensive report informed by surveys and focus groups with over 1,100 certified organic and transitioning-organic farmers across North America.³

2) Research develops our understanding of the tangible agronomic and economic benefits of agricultural production systems and has a significant return on investment, but have experienced decreasing public investments

Organic agriculture research programs have demonstrated significant success in showcasing the benefits of organic farming systems and improving their profitability by helping farmers overcome challenges related to soil, nutrient, weed, pest, and disease management. These programs have contributed valuable insights into sustainable practices, soil health improvement, and pest management strategies that are essential for the specialty crops industry. Notably, practical outcomes of organic specialty crop research can be applied by *all* specialty crop farmers to improve net returns and long term sustainability. ERS has found that for every dollar invested into public research projects, \$20 of benefits are produced, providing a remarkable return on investment.⁴

In light of this, it is concerning to note that public investments in agriculture research have declined by 20% since 2000.⁵ This decline limits the growth potential of specialty crop production and hampers the industry's ability to address emerging challenges, such as those posed by natural disasters including extreme weather events driven by climate change, market disruptions, and evolving consumer demands.

² See, Results from the 2021 Organic Survey, USDA-NASS,

https://www.nass.usda.gov/Publications/Highlights/2022/2022_Organic_Highlights.pdf

³ Snyder, L., Schonbeck, M., Velez, T., & Tencer, B. (2022). *2022 National Organic Research Agenda: Outcomes and Recommendations from the 2020 National Organic & Transitioning Farmer Surveys and Focus Groups*. Organic Farming Research Foundation. Retrieved from https://ofrf.org/wp-content/uploads/2022/08/OFRF_National-Organic-Research-Agenda-NORA_2022-report-FINAL.pdf.

⁴ USDA ERS - Investment in U.S. Public Agricultural Research and Development Has Fallen by a Third Over Past Two Decades, Lags Major Trade Competitors, <https://www.ers.usda.gov/amber-waves/2022/june/investment-in-u-s-public-agricultural-research-and-development-has-fallen-by-a-third-over-past-two-decades-lags-major-trade-competitors/> (last visited Mar. 1, 2024).

⁵ *Id.*



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3) The SCCI should recognize the importance and impact of these research programs and integrate them into their report

In the context of the SCCI, we urge the USDA to recognize and prioritize the importance of research programs. Integrating the findings and recommendations from existing organic agriculture research initiatives into the SCCI report will provide a comprehensive understanding of the industry's needs and help identify effective administrative actions to support competitiveness. This could be accomplished through increased funding for in-house organic research at the Agricultural Research Service (ARS); streamlining the RFA processes for NIFA's OREI and ORG programming; not siloing organic research into OREI and ORG; and continued and expanded collaboration with the greater research community.

a) Increased funding for in-house organic research at ARS

Investing in organic research at the ARS is a strategic imperative that aligns with the evolving landscape of sustainable agriculture. Organic farming practices not only contribute to climate mitigation and ecological resilience but also address consumer demands for healthier and environmentally friendly produce. As the agricultural sector undergoes transformative changes, it is essential for the ARS to lead the way by expanding investments into organic research. This entails dedicating resources to investigate organic cultivation methods, soil health management practices, and innovative technologies that can bolster the organic sector and all of the specialty crop industry. Currently, ARS invests less than 1% of its budget into organic agriculture topics. This is while organic agriculture continues to grow well past 6% of the food sales market.⁶ Increased funding for organic research within the ARS not only propels scientific advancements but also fosters a resilient and competitive agricultural industry, benefitting all production systems and ensuring that our nation remains at the forefront of sustainable and organic farming practices.

b) Streamlining RFA Processes for Research to allow for increased researcher-stakeholder engagement

With OFRF's years of high engagement with organic researchers and our own participation as project leads, we have collectively identified some challenges with the administration process of two important National Institute for Food and Agriculture competitive grant programs: the Organic Research and Extension Initiative (OREI) and the Organic Transitions Program (ORG). To ensure that researchers are set up for success, in an inclusive and fair way, which we believe will increase the submission of high quality grant proposals, we suggest two things:

i) Predictability in timing of release.

Over the past several years the time of releasing the RFA for these two programs has been unpredictable. For OREI, it has ranged from October to March since 2014. When considering the academic calendar and the capacity constraints that places on research professors, as well as

⁶ Organic Trade Association, Organic Industry Survey 2023 Pg. 30.



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the seasonal nature of farm work that can limit producer engagement in proposal development, this inconsistency can lead to inconsistent application rates and a significant barrier to less-resourced institutions and farmer-led applicants. With more consistency in the timing of RFA release, we expect that applicants will be able to better fit the whole application planning and execution process into their workflow for the year. This is especially important for academics with heavy teaching loads that are inflexible.

ii) Consistency in available time for application with more time between release of RFA and application deadline.

Similar to the release date of the OREI and ORG RFAS, a more-consistent timeframe to draft a grant application is prudent. Since 2014, the amount of days to apply range from 37 to 91, which reflects 5 to 13 working weeks. Many universities require an internal review process that can take up to 10 business days, and therefore, when considering the administrative processes and requirements many institutions have to meet for grants of the scale of OREI, the actual time between RFA release and the deadline can be severely limiting to potential applicants. This is especially true for applicants who have heavy teaching loads, limited administrative support, and are at institutions that have limited resources all around. We recommend a time frame of 90 days.

c) Continued Investment in Organic Research Through Other Competitive Grant Programs

We are encouraged by the inclusion of organic agriculture as a priority in the RFAs for the Specialty Crop Research Initiative (SCRI) and the Agriculture and Food Research Initiative (AFRI), but are concerned that SCRI- and AFRI-funded projects are not meeting the need. Although there was an initial increase in organic agriculture research projects when this language was added, there has been a lull in these funding efforts recently. We would like to encourage USDA-NIFA to continue to ensure that these two programs continue to meaningfully fund organic agriculture research projects and do not silo organic agriculture topics into the two dedicated extramural research programs OREI and ORG. This could be done through having a standing organic representative seat on SCRI and AFRI review committees.

d) Collaboration with Research Institutions and Foundations, Extension Services, and Farmers

The success of the SCCI is tied to fostering strong collaborations with research institutions and foundations, creating partnerships that draw from the collective wisdom, expertise, and resources of both the public and private sectors. By engaging in collaborative efforts with these entities, the initiative gains access to existing knowledge, cutting-edge methodologies, and diverse perspectives. These partnerships play a crucial role in reducing the likelihood of duplicative work, promoting efficient resource utilization. Effective communication and coordination within this collaborative framework allow for the identification of ongoing research initiatives, the sharing of findings, and strategic resource allocation to investigate unexplored avenues. By building upon existing efforts and forging collaborative bonds with research institutions and foundations, the



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SCCI would establish a robust foundation, foster innovation and propel the specialty crops industry toward sustainable growth and global competitiveness.

In addition to collaboration with research institutions and foundations, the success of the SCCI equally relies on engaging individual researchers, extension agents, and farmers in a dynamic partnerships. This collaboration ensures that research outcomes remain practically applicable to on-the-ground agricultural practices. By involving extension agents and farmers, the initiative benefits from diverse perspectives, enhancing the relevance and impact of its endeavors. This inclusive approach also minimizes the risk of duplicative work, as effective communication and coordination among researchers, extension professionals, and farmers help identify ongoing research initiatives, share findings, and strategically allocate resources. The SCCI, through its collaboration with extension services and farmers, would build a comprehensive and cohesive platform that not only optimizes resource utilization but also fosters innovation, contributing to the sustainable growth and global competitiveness of the specialty crops industry.

4) Other recommendations for SCCI based on our NORA-22 report.

The NORA report serves as a testament to the profound impact of research, providing valuable insights into the challenges and opportunities faced by organic farmers.⁷ This trend underscores the urgency of addressing the decline in research funding, especially in the context of specialty crop production.

a) Integration of Organic Systems

The organic farming sector stands as a beacon of sustainable and climate-smart agriculture, both environmentally and economically. By intentionally integrating the requirements and needs of organic systems into the initiative, it will acknowledge the distinct challenges and opportunities inherent in organic crop production. This integration not only ensures the inclusivity of diverse agricultural practices but also positions the SCCI as a comprehensive and forward-thinking initiative. Recognizing and addressing the intricacies of organic farming, such as soil health management, ecologically based pest control, and organic certification, will foster a more resilient and competitive specialty crops industry. It is through this integrative approach that the SCCI can truly champion the diverse needs of all stakeholders, propelling both the organic sector and the specialty crops industry towards a sustainable and thriving future.

b) Public Awareness and Outreach

As the SCCI strives to fortify its partnership with the organic farming community, it is imperative for the USDA to enhance its public awareness and outreach efforts, particularly targeting organic

⁷ Snyder, L., Schonbeck, M., Velez, T., & Tencer, B. (2022). *2022 National Organic Research Agenda: Outcomes and Recommendations from the 2020 National Organic & Transitioning Farmer Surveys and Focus Groups*. Organic Farming Research Foundation. Retrieved from https://ofrf.org/wp-content/uploads/2022/08/OFRF_National-Organic-Research-Agenda-NORA_2022-report-FINAL.pdf.



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producers. As described above, organic agriculture embodies a distinctive and regenerative approach to farming, and increasing public awareness about the USDA's programs and services is pivotal to fostering a collaborative and informed ecosystem. By implementing targeted outreach initiatives, the USDA can bridge the awareness gap and ensure that organic producers are well-informed about the available tools, resources, and support mechanisms. This proactive approach not only strengthens the bond between the USDA and the organic community but also empowers organic farmers to actively engage with and benefit from the initiatives put forth by the SCCI. Heightened public awareness serves as a catalyst for mutual understanding, propelling the specialty crops industry, and organic agriculture, in particular, towards a future marked by shared success and sustainable growth.

c) Training and Capacity Building for Extension Services in Organic Systems

The importance of robust training programs cannot be overstated, particularly concerning organic-applicable assistance for extension services and other technical service providers. Organic agriculture represents a unique and dynamic sector which requires a specialized skill set for those tasked with providing assistance to farmers. Training programs play a pivotal role in equipping extension services and technical providers with the knowledge and expertise required to navigate the intricacies of organic farming practices. These programs should encompass a holistic understanding of organic systems, covering aspects such as soil health management, pest control, and organic certification processes. Moreover, as the organic sector evolves, training programs need to stay current, incorporating the latest research findings and technological advancements. By investing in comprehensive training initiatives, we not only empower extension services and technical providers to better serve organic farmers but also ensure the sustained growth and success of the organic industry. Ultimately, a well-trained and informed support network is vital for fostering innovation, addressing challenges, and advancing the goals of initiatives like the Specialty Crop Competitiveness Initiative.

d) Supply Chain development for organic production

The imperative for supply chain development within the organic sector is a critical consideration as we strive for increased production. The organic industry's unique handling requirements necessitate a robust and dedicated supply chain infrastructure to accommodate the growing volume of organic produce. Without a well-developed supply chain, the expansion of organic production faces significant challenges in finding suitable channels for distribution, storage, and transportation that adhere to the stringent organic handling standards. Addressing this need involves strategic investments in supply chain development, including storage facilities, transportation networks, and distribution centers tailored to meet the specific requirements of organic products. By fortifying the organic supply chain, we not only create avenues for increased production but also ensure that organic producers have reliable outlets for their goods. This comprehensive approach is vital for the sustained growth of the organic sector, aligning with the



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goals of initiatives like the Specialty Crop Competitiveness Initiative by fostering a resilient and efficient supply chain that can effectively handle the unique demands of organic agriculture.

5) Conclusion

In conclusion, OFRF applauds the USDA's initiative in seeking input for the SCCI, underscoring the collaborative effort required to enhance the competitiveness of specialty crops across the food system. Our contribution emphasizes the pivotal role of research in achieving the SCCI's goals and fostering the sustainability and growth of the specialty crops industry.

Research serves as the bedrock of agricultural innovation, offering insights that drive improved production practices, cost reduction, and enhanced industry competitiveness. Unfortunately, public investments in research have declined by 20% since 2000, posing a barrier to specialty crop production's growth and ability to address emerging challenges.⁸ In this context, we urge the SCCI to integrate existing research findings, especially from organic agriculture initiatives, into its plan. These findings include integrated soil health practices, new vegetable cultivars suited to organic and low-input systems, or specific advances in pest management in specialty crops. In order to build on existing findings to advance the science of specialty crop production and organic agriculture, we need to increase funding for organic research at the Agricultural Research Service (ARS) to align with the evolving landscape of sustainable agriculture.

Moreover, streamlining Request for Application (RFA) processes is crucial, requiring predictability in timing and consistent timeframes for application. This ensures inclusivity, especially for institutions with heavy teaching loads and limited resources. Collaboration with research institutions and foundations, along with extension services and farmers, is paramount for the SCCI's success. By forging strong collaborative bonds, the initiative taps into existing knowledge, reduces duplicative work, and strategically allocates resources.

The SCCI's success further hinges on recognizing and addressing the distinct needs of organic systems. Integrating organic farming requirements ensures the initiative is comprehensive and forward-thinking. Public awareness and outreach efforts, particularly targeting organic producers and consumers, are equally vital. Heightened awareness bridges the gap between the USDA and the organic community, empowering farmers to engage actively with SCCI initiatives.

Training and capacity building for extension services in organic systems are imperative. These programs equip providers with the knowledge to navigate the complexities of organic farming, fostering innovation and addressing challenges. Lastly, supply chain development is critical for

⁸ USDA ERS - Investment in U.S. Public Agricultural Research and Development Has Fallen by a Third Over Past Two Decades, Lags Major Trade Competitors, <https://www.ers.usda.gov/amber-waves/2022/june/investment-in-u-s-public-agricultural-research-and-development-has-fallen-by-a-third-over-past-two-decades-lags-major-trade-competitors/> (last visited Mar. 1, 2024).



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organic production's increased volume. A robust supply chain ensures suitable channels for distribution, storage, and transportation, aligning with the SCCI's goals and fostering the sustained growth of the organic sector.

In essence, these recommendations underscore the importance of a holistic and collaborative approach, involving research, outreach, training, and infrastructure development. By prioritizing these elements, the SCCI can pave the way for a more competitive, sustainable, and resilient specialty crops industry, benefiting producers, consumers, and the broader food system.

Thank you for your time and attention to this vital industry,

Organic Farming Research Foundation, joined by

National Organic Coalition

National Sustainable Agriculture Coalition

Northeast Organic Dairy Producers Alliance

Ohio Ecological Food and Farm Association

The Organic Center

Organic Trade Association