



Dionne Toombs
Acting Director, National Institute of Food and Agriculture
U.S. Department of Agriculture.
Submitted via email

November 30, 2022

Dear Dr. Toombs,

Thank you for the opportunity to submit comments for the National Institute of Food and Agriculture (NIFA) Notice of Stakeholder Listening Session Regarding Science Priorities.

The Ohio Ecological Food and Farm Association (OEFFA) is a grassroots coalition of more than 4,200 farmers, gardeners, retailers, educators, and others who since 1979 have worked to build a healthy food system that brings prosperity to family farmers, safeguards the environment, and provides safe, local food. Certified organic farmers make up the bulk of our membership, as well as the bulk of our policy steering committee. OEFFA's Certification program has been in operation since 1981. OEFFA certifies more than 1,100 organic producers and food processors, in a twelve-state region, ensuring that these operations meet the standards established for organic products. We work to support our farmers in their efforts to engage in organic production, a holistic system involving suites of holistic, synergistic practices informed by indigenous knowledge, on-the-ground experience, and the most up-to-date research available.

Because organic is an holistic ecological approach, farmers engaging in organic, climate-smart agriculture and regenerative agriculture production benefit from farmer-led, on-farm, systems-based research. Farmers help to ground the research in the needs of the organic farmer, and can help to inform the research questions being asked. Two important guiding documents listing stakeholder priorities are of particular importance in determining organic farmer needs: The [recommendations of the National Organic Standards Board \(NOSB\)](#) beginning on page 43 from the October 2022 NOSB meeting, and the Organic Farming Research Foundation's (OFRF) [National Organic Research Agenda](#).

Not only will investment in research meeting the demands of organic producers and the priorities of organic stakeholders serve existing organic producers and the communities they nourish, but it will also go far to support transitioning operators on the path to organic production and regenerative producers who share many organic principles. These investments will also aid the growing cadre of conventional farmers looking to adopt more sustainable practices. The long-awaited and substantial \$300 million investment in organic transition by USDA will require the support of research on existing and emerging production, processing, and marketing needs. Seeds and breeds that are publicly available and regionally adapted, pest, weed, and disease management techniques, nutrient management, and larger systems related to organic processing and marketing resources and opportunities require NIFA's urgent attention.

In order to effectively meet the needs of organic and regenerative producers, it is imperative that organic research be prioritized, both within programs specifically designated for organic research, and mainstreamed in other existing research programs, since we know the outcomes of organic research go far to serve both

organic and non-organic farmers and eaters. Indeed, research on organic management systems has resulted in both economic and ecologically sound management systems for all producers. NIFA would therefore do well by all producers to both minimize the funding gap between non-explicitly organic and organic-specific programs like the Organic Research and Extension Initiative (OREI) and the Organic Transitions Program (ORG) and to prioritize organic research across all competitive research grant programs including the Agriculture and Food Research Initiative (AFRI) and the Specialty Crop Research Initiative (SCRI).

We also appreciate your questions regarding access. Access to research funding is important, as is access by farmers to research-based information. In the region we serve, Land Grant Universities are largely disengaged from organic research. While we are working in partnership with Land Grant institutions to actively cultivate an engaged Organic Farmer Researcher Network, we want to ensure that funding for organic research programs such as ORG are accessible to institutions beyond Land Grant Universities, those who have historically served organic farmers by both conducting organic research and providing research-based information in our region. Additionally, since there is an active investment in organic transition by USDA through the Organic Transition Initiative, we recommend changing the name of ORG to be more accurately descriptive and avoid confusion between these various programs intended to serve organic and transitioning producers. In our experience serving organic producers, direct farmer feedback loops and short technical publications play a critical role, but are often not prioritized by research institutions. It would be beneficial to the farmers if NIFA prioritized strong partnerships with farmers in project design, implementation, and information sharing so that important research outcomes reach the stakeholders for whom they were intended.

On behalf of the Ohio Ecological Food and Farm Association and OEFFA Certification,

Amalie Lipstreu
Policy Director
Ohio Ecological Food and Farm Association