7 June 2010

Dr. Roger Beachy, Director
United States Department of Agriculture
National Institute of Food and Agriculture
1400 Independence Avenue SW, Stop 2201
Washington, DC 20250-2201

Re: National Institute for Food and Agriculture (NIFA) Agriculture and Food Research Initiative (AFRI)

Dear Dr. Beachy:

The Entomological Society of America (ESA) is the largest organization in the world serving the professional and scientific needs of entomologists and people in related disciplines. Founded in 1889, ESA today has more than 6,400 members affiliated with educational institutions, health agencies, private industry, and government. Members are researchers, teachers, extension service personnel, administrators, regulators, marketing representatives, research technicians, consultants, students, and hobbyists.

ESA applauds the development by NIFA of an AFRI program that addresses key societal needs, and is very supportive of the five focus areas of Global Food Security, Climate Change, Sustainable Bioenergy, Nutrition/Childhood Obesity, and Food Safety. ESA’s members will contribute significantly to all of these areas.

However, we are very concerned about potential unintended consequences of the scope and implementation of the AFRI Request for Applications. In this regard, ESA supports the comments made by the Experiment Station Committee on Organization and Policy (ESCOP), in particular, the importance of engaging Land Grant institutions in NIFA planning; the critical need for single-investigator and small-team grants to meeting agriculture’s needs; providing support for basic discovery and exploratory grants; providing capacity-building grants for small institutions such as 1862 and 1890 institutions; the importance of supporting planning grants; and the awareness that local issues are excellent models to address national and international concerns.

ESA has some additional concerns we would like to raise. We are concerned that the AFRI no longer addresses specific arthropod-related programs (such as those that were provided in the USDA-National Research Initiative-Competitive Grants Program in the past). We are very supportive of NIFA’s efforts to continue to grow the AFRI funding to a level sufficient to be able to address large-scale, complex problems over the long term. Production agriculture, which is so important to the economic health of the country, is not addressed specifically by the AFRI priorities, and ESA feels strongly that this is a serious gap in coverage.
Of greater concern is that the specificity of individual programs is being prescribed in very specific ways, rather than being driven by the best available science to solve a particular need. ESA feels that this limits potential submissions that could help meet the key society needs as identified in the five AFRI focus areas. By comparison, the National Science Foundation uses a model based on broad programs, and funding is based on an evaluation of the best science proposed to address needs in the broad programs. In the future, we urge NIFA to consider funding some programs under broad categories; e.g., any aspect of Plant Health, which would encourage creative submissions to meet the needs, and could involve, for example, single-investigator and small-team grants.

Further, we are concerned that it appears that funding will change from year-to-year. ESA encourages NIFA to fund more longer-term grants, such as five-year projects.

Additionally, ESA urges restoration of the Integrated Research, Education, and Extension Competitive Grants Program (Section 406) research programs. Section 406 supports critical integrated pest management (IPM) research through initiatives such as Crops at Risk (CAR), the Risk Avoidance and Mitigation Program (RAMP), Methyl Bromide Transitions (MBT), Regional IPM Centers, and the Organic Transitions Program. Funding for these programs was zeroed out in the President’s FY 2011 budget, leaving a critical lack of funding for IPM programs for production agriculture and other important issues.

Finally, there needs to be a specific and continuing mechanism provided by which the entomological community can help NIFA identity and implement agricultural research priorities. We are very supportive of the success of the new NIFA-AFRI program, and would like to be engaged in this process.

In summary, ESA supports the intent of NIFA to increase resources to support agricultural research and a problem-solving approach to meeting key societal needs. Some of the proposed changes in the AFRI program will greatly strengthen this goal. Other proposed changes, such as indicated above and in the ESCOP submission, could impede this effort. The ESA membership wants and needs to be a part of developing this new vision to support agricultural research. We look forward to working with you to do this.

Thank you very much for the opportunity to provide input into the NIFA-AFRI program.

Sincerely,

David B. Hogg, President
Entomological Society of America