



March 8, 2024

Erin Morris, Associate Administrator  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Avenue SW  
Washington, DC 20250

**Re: Docket ID No: AMS–SC–23–0073 Request for Information Specialty Crops  
Competitiveness Initiative**

*Submitted electronically via Regulations.gov*

Dear Associate Administrator Morris,

The National Association of State Departments of Agriculture (NASDA) welcomes the opportunity to provide feedback on the USDA’s efforts to administratively support the specialty crop industry in remaining competitive in domestic and international marketplaces as part of USDA’s Specialty Crops Competitiveness Initiative (SCCI). We note that while the Agricultural Marketing Service solicits these comments, the SCCI is an overarching assemblage of programs and activities involving multiple USDA mission areas and agencies. This will require significant communication and coordination across USDA, with state departments of agriculture and industry stakeholders to maximize its impact.

**I. About NASDA**

NASDA represents the Commissioners, Secretaries, and Directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs, including food safety, combating the spread of plant and animal diseases, and fostering the economic vitality of our rural communities.

**II. General Comments**

NASDA supports USDA’s efforts to enhance the competitiveness of specialty crops through a suite of administrative and statutory programs – collectively referred to as the SCCI. The SCCI components include programs for research, education, and extension; domestic and international market promotion; crop insurance; disaster assistance; and infrastructure development.

State departments of agriculture play a significant role in many of these programs through data collection, education and outreach, and program administration and delivery.

As cooperative partners in the administration of the programs contained within the SCCI, state departments of agriculture are focused on cooperation between federal and state agencies, cost-conscious management of resources, enhanced engagement with stakeholders, and increased program support.

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*NASDA POLICY*

*NASDA supports the Specialty Crop Block Grant Program (SCBG) as an effective collaboration between state departments of agriculture, the specialty crop industry, and USDA.*

*NASDA believes the SCBG program must be flexible and state-driven in order to be nimble, locally responsive, and efficient.*

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### **III. Cooperation**

Collaboration between state departments of agriculture, the specialty crop industry, and USDA has proven to be a successful model of cooperation that has resulted in positive impacts on specialty crop research, domestic and international marketing and promotion, production, and consumption.

NASDA recommends that USDA continually emphasize this initiative's purpose and where each component fits within the overall strategy, and then provide state departments of agriculture and industry stakeholders with specific goals for each program individually and collectively across the initiative.

Where there is a direct administrative relationship between USDA agencies and state departments of agriculture, NASDA urges USDA to allow state agencies, in consultation with industry stakeholders, to create and then demonstrate measurable benefits and outcomes. Likewise, sufficient resources should be allocated to states through administrative and indirect costs to ensure each state (and territory) can administer impactful programs.

Much of the success and growth of the programs within the SCCI will be contingent upon program flexibility and responsiveness to both the variability of the specialty crop industry and local concerns.

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*NASDA POLICY*

*State block grants should be directed towards state departments of agriculture and used (1) to strengthen state-led efforts to promote the marketing and consumption of specialty crop products; (2) to strengthen state-led efforts to promote investments in specialty crop research; and (3) enhance food safety of specialty crop products.*

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## **IV. Management**

Increasing competitiveness encompasses a spectrum of outcomes. In some cases, programs or activities will increase sales or value of specialty crops. In other cases, efforts may result in slowing the loss of products or market decline.

Various unrelated issues can impact specialty crop sales, including trade disputes, phytosanitary issues, export conditions, weather, and other factors affecting farmers, supply chains, retailers, wholesalers, and/or consumers.

Promoting specialty crops must include science-based decision-making regarding the international regulation of SPS. This fundamental objective is under attack, and we must stand together to combat the tactics of those countries who reject science risk-based decision-making, specifically the European Union and its Farm-to-Fork policies.

These policies demonize the technological advancements we have made in agriculture through improved chemistry and biotechnology. These policies have already and will continue to threaten our ability to produce sufficient food and fiber to support the world population, which just recently surpassed 8 billion people.

The above factors demonstrate that even a perfectly executed campaign can result in sales remaining constant or even declining.

Enhancing competitiveness and establishing markets for specialty crops is a nuanced, long-term undertaking involving consumer perception, evaluation, shared values, behavior, and acceptance. While sales data itself may be important, sales data should not be the sole driver of the SCCI.

NASDA recognizes that even with robust management controls, some efforts may be duplicated within and across the various SCCI programs. Nevertheless, reflecting on the limited resources available and minimizing duplication is essential. Where duplication does occur, impacts should be additive.

To maximize the impacts of the SCCI, NASDA recommends USDA in consultation with state departments of agriculture and specialty crop industry stakeholders consider establishing performance goals or measures across the USDA mission areas with delegated authorities for the various SCCI programs.

If implemented, performance measures must be crafted to avoid any restrictions on funding for critical marketing activities, food safety research, and technological advancements needed to improve the competitiveness of specialty crops.

Likewise, every effort should be made to maximize resources available for on-the-ground activities to advance the competitiveness of specialty crops.

In sum, performance measures are a specific tool for assessing whether the initiative as a whole, or its constituent parts, is providing desired outcomes.

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*NASDA POLICY*

*NASDA supports additional crop insurance resources for specialty crop farmers.*

*NASDA supports the inclusion of specialty crop farmers in conservation programs.*

*NASDA supports a defined process through USDA for presently unspecified or ineligible commodities to receive consideration for specialty crop designation as part of the SCBGP.*

*NASDA recognizes that the addition of new SCBGP designation commodities impacts available federal funding and advocates that the addition of new commodities be accompanied by an appropriate increase in federal funding.*

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## **V. Stakeholder Engagement**

Much of the success and growth of SCCI programs can be attributed to flexibility and responsiveness to both the variability of the specialty crop industry and local concerns. The state-driven nature of many of the SCCI programs is key to this flexibility and responsiveness.

While individual state departments of agriculture may have unique perspectives on these programs and may provide separate input on specific aspects of each, NASDA recommends a number of general principles for implementing the SCCI:

- Preserving the flexibility, responsiveness, and state-driven nature of each applicable program.
- State departments of agriculture must be able to actively participate in reviewing and identifying program priorities and performance measures.
- Where applicable, states should have a direct role in managing and administering SCCI programs.

## **VI. Program Support**

NASDA understands that mandatory spending caps or discretionary appropriations limit many programs. Nevertheless, where flexibility exists, NASDA strongly encourages USDA to increase investment in specialty crop programs. Some programs with particular relevance include:

### *GusNIP:*

To create more economic opportunities for U.S. producers and farmers, USDA can increase support the Gus Schumacher Nutrition Incentive Program (GusNIP), which funds nutrition incentive and produce prescription projects that helps people with low income bring home more nutritious, affordable food.

The number of food retailers and clinics offering incentives through GusNIP continues to grow every year, attracting nearly 150,000 monthly participants who report eating more fruits and vegetables than the average American.

GusNIP creates a powerful ripple effect through local economies – benefiting farmers and businesses alike – generating approximately \$85 million in incentive spending at local food retailers in 2022.

### *Farm to School*

NASDA supports the USDA Farm to School Grant Program as it increases use and improves access to local foods in schools while also fostering experiential food education for our nation’s children. Participating schools should be given more opportunities and financial flexibility to increase direct purchases of local products outside of the school food service contracts. This will drastically increase direct purchasing power, funneling dollars into the local economy, and remove a major hurdle to Farm to School implementation.

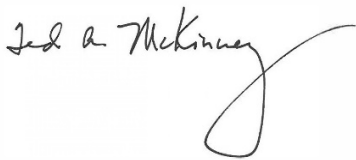
### *Increase Investments into LFPA and LFSA Programs*

Increase investments in Local Food Purchasing Assistance (LFPA) and Local Food For Schools agreements (LFSA) to foster market access and expansion for specialty crops, providing opportunities for producers and farmers to expand distribution channels and strengthen local and regional supply chain resilience.

## **VII. Conclusion**

NASDA recognizes the challenges of making the various SCCI programs work harmoniously. We recommend that open lines of communication remain between state departments of agriculture, USDA, and industry stakeholders so that guidance can be developed for individual programs and across the initiative to ensure programs are nimble and responsive.

Sincerely,

A handwritten signature in black ink that reads "Ted McKinney". The signature is fluid and cursive, with a large loop at the end of the last name.

Ted McKinney  
Chief Executive Officer  
NASDA