



January 2, 2013

Edward Ragland
Marketing Services Division
Transportation and Marketing Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave. SW.
Room 4523 South Building, Ag Stop 0269
Washington, DC 20250-0269

Dear Mr. Ragland,

On behalf of the Farmers Market Coalition (FMC), this letter serves as a response to Federal Register Notice Docket Number AMS-TM-12-0050; TM-12-02.

FMC membership includes more than 640 organizations representing nearly 4,000 farmers markets and more than 25,000 agricultural producers. As an organization, we highly value the research efforts of the USDA Agricultural Marketing Service (AMS). The USDA Farmers Market Directory is an unparalleled resource, providing the public, researchers, media, and farmers market practitioners with the only comprehensive census of farmers markets currently available. Maximizing its accuracy is therefore of critical importance, and we applaud USDA AMS' efforts to upgrade its data collection processes to reduce duplication and respondent burden while systematically improving the collective understanding of farmers market characteristics.

In the last two years, the Directory has undergone many positive changes, including publication of geographic coordinates as well as the inclusion of additional variables and searchability criteria. The ability of USDA to collect annual information for this purpose potentially eliminates need for a lengthy census survey every four years, considering that the time between such a census and the publication of results is too long to keep pace with rapidly evolving sector. Conducting an annual survey with basic information as well as a small number of very targeted questions along a certain theme will ease respondent burden, improve the response rate, and speed the publication timeframe.

What follows are some specific recommendations and comments designed to assist the agency in its proposed data collection efforts, most specifically as they relate to farmers markets.

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1) Definition of terms

FMC applauds the inclusion of other farm-direct sales such as on-farm markets and CSAs in AMS' research efforts, and supports having clear definitions distinguishing these types of retail outlets. AMS' proposed congruence with FMC's definition of farmers markets will help maximize consistency.

- 1 Defining the scope of research: The inclusion of local foods in both traditional outlets and institutional and consumer food hubs (including online "farmers markets") grows daily. If it is AMS intention to only collect and maintain information on direct-marketing outlets, it may be useful to outline to potential responders that the scope of research only includes outlets in which direct transactions between farm businesses and consumers takes place.
- 2 Glossary of terms: To assist respondents and database users, we recommend inclusion of a brief glossary of terms (with hyperlinks from places in which they appear) that clarifies basic terminology in the questions and reduces confusion about classifications and the intent of the questions themselves. This could be similar in format to the existing Farmers Market Glossary (PDF available on the FMC web site at http://farmersmarketcoalition.org/wp-content/uploads/2012/08/Farmers_Market_Glossary_120627_lo.pdf)
- 3 Definition of on-farm markets: While on-farm markets are not FMC's area of expertise, we would humbly suggest that their proposed definition be amended for clarity to: "An on-farm market is a **retail outlet (i.e, a physical building or stand) on or adjacent to a farm where that farm business sells its agricultural products** ~~transactions between farm market operator and~~ directly to customers ~~take place...~~"
- 4 Definition of Community Supported Agriculture (CSA): Because of the growing number of farm subscription models that are popularly referred to as CSAs, FMC suggests that a concise definition of CSA would more appropriately include the term 'subscription.'

2) Variables for Inclusion in Annual Survey and Alternating Themes

Making the geographic coordinates of market locations publicly available was an important advent celebrated by FMC and its members. We look forward to the regular inclusion of additional characteristics in the annual update, mindful that the number of these questions should be limited and selected purposefully based on greatest utility for users. Many of the topics proposed by AMS (like special events or marketing methods, for example), are valuable variables, but may not justify annual updating since they are not likely to be meaningful to the general public.

One potential strategy moving forward may involve markets establishing an initial online account in 2013, with collection of essential market characteristics that could be stored and updated by users each spring. In concert with a reminder to update this data, AMS could include an annual "theme" with up to eight very specific questions aligned with national research priorities. Such themes might include specific indicators on:

- Economic development, including sales, staffing, business incubation, and the role of women and minority owned businesses
- Fresh food access and nutritional programming, including participation in federal nutrition programs, fresh produce incentives, and cooking demonstrations
- Agricultural producer participation, including farmer demographics, acres in production, organic products, and crop diversity



- Community engagement and organizational partnerships, including nonprofit, volunteer, and youth participation
- Organizational capacity, governance methods, physical infrastructure, annual budget, staffing, and professional development needs
- Challenges/barriers identified by the market and which limitations should be addressed

If such themes are strategically identified by the fall of each year, the respondent community can be advised before the traditional close of the market season, and prepare to collect any necessary pieces of information from relevant parties such that it is on hand during the appropriate survey response window. The Farmers Market Coalition can be available as a partner to support AMS' survey invitations and directory update appeals in order to reinforce trust and maximize response rates.

3. Improving Accuracy

One of the most common complaints FMC hears regarding the USDA Farmers Market Directory is its level of perceived inaccuracy-- omission of farmers markets whose data has been submitted, as well as inclusion of outlets that no longer exist or are not actually 'farmers markets.' We believe upgrades to the process will help addresses these concerns, though it will remain critical to ensure that retail outlets are appropriately classified and removed if not updated for two survey cycles. Market manager participation is crucial to ensure accuracy, and communication to the respondent population must be clear, consistent, and offer sufficient response windows.

4. Collaboration with other agencies and organizations

With no end to the number of questions researchers, policymakers, practitioners, and others might seek to ask of farmers market organizations, already-taxed market managers are subject to surveys from state agencies, federal agencies (including the Agricultural Marketing Service (AMS) and Food and Nutrition Service (FNS)), other national organizations (including FMC), and independent researchers. A concerted effort to collaborate with such organizations in the annual identification of trending topics and a small number of high-priority indicators clustered into themes will increase relevance for these stakeholders and ensure their support in widespread promotion and outreach to ensure a high response rate for AMS.

Engaging the Farmers Market Consortium: Collaboration Task forces may be formed among members of the Farmers Market Consortium to narrow down the scope of questions for particular themes. The year prior to collecting economic development data, for example, an Consortium Economic Development Task Force including ERS, economic development agencies, non-traditional funders of market activities, and even an FMC member market representative, could be engaged to propose eight questions for the following year's data theme. Doing so will also eliminate the need for multiple surveys administered by multiple organizations, demonstrating cohesiveness while building trust and leadership in the sector.

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Continued partnership with USDA FNS: To ensure maximum congruence across agencies, FMC recommends ongoing collaboration with USDA FNS to reconcile data on farmers markets, on-farm markets, and CSAs participating in federal nutrition programs like SNAP, Farmers Market Nutrition Programs, and WIC Fresh Fruit and Vegetable Cash Value Benefits.

5. Encouraging regular evaluation and engaging market participation in research

This year, the Farmers Market Coalition began to identify indicators for measuring farmers markets, a short selection of which is available on the FMC web site at <http://bit.ly/R8OG2p>. Such indicators are being piloted 2013, and FMC is eager to continually refine them while encouraging farmers market managers to use them in the course of their own evaluation. Similarly, FMC can work with AMS to translate these indicators into appropriate and clearly-worded questions that honor the diversity of markets throughout the country. We believe that, working together, FMC and AMS can empower farmers markets to engage in ongoing measurement. Coordination on annual themed campaigns will allow our organization to appropriately engage its local, state, regional, and national members and partners (through emails, webinars, and guest blog posts) to reinforce the importance of participation in AMS efforts.

The Farmers Market Coalition looks forward to such partnerships to identify survey emphases, meaningful indicators, and methods to maximize farmers market managers' participation.

Thank you for your continued efforts to understand and communicate the characteristics and impacts of the farmers market sector.

Sincerely,



Bernadine Prince, President
Farmers Market Coalition

cc: Arthur Neal, Deputy Administrator, Transportation & Marketing Program
Errol Bragg, Associate Deputy Administrator, Transportation & Marketing Program
Debra Tropp, Branch Chief, Farmers Market & Direct Marketing Research