



December 16, 2015

David Hancock
NASS Clearance Officer
U.S. Department of Agriculture
Room 5336 South Building
1400 Independence Avenue SW
Washington, DC 20250– 2024

Re: NSAC Comments on Docket Number 2015-0535– NEW

Submitted via Email to: ombofficer@nass.usda.gov.

The National Sustainable Agriculture Coalition (NSAC) welcomes the opportunity to submit comments on the National Agriculture Statistics Services' (NASS) plan to conduct a new information collection to gather data related to the production and marketing of foods directly from farm producers to consumers or retailers. NSAC is submitting these comments to express our support for and strongly encourage NASS to move forward with its plan to implement new provisions included in the 2014 Farm Bill authorized under the Local Food Production and Program Evaluation Initiative.

The National Sustainable Agriculture Coalition is a national alliance of over 40 family farm, food, rural, and conservation organizations that together take common positions on federal agriculture and food policies to advance sustainable agriculture. Many of our members work directly with farmers, consumers, and other partners who participate in and benefit from local and regional food system across the country. Likewise, NSAC and our members agree that increased availability of more detailed data associated with this emerging part of our agricultural economy is urgently needed.

Local and regional food markets are one of the fastest growing sectors of demand attracting interest from farmers of all commodities and regions today. Sixty-two per cent of consumers are more likely to buy food and beverages described as local, and 57 percent specifically seek out restaurants offering locally sourced products. Additionally, if all direct-to-consumer sales in the country were ranked as a commodity, they would make up the 4th largest agricultural activity, with total farm sales of over \$8.7 billion.

These local and regional market outlets are particularly important to beginning, small, and mid-sized farmers including immigrants, communities of color, veterans and women, and are often the most easily accessible markets available to these new and aspiring entrepreneurs.

NSAC supports NASS's proposed data collection activities on direct-to-consumer and retailer sales, as more comprehensive and concise data would help these farmers obtain sound market information about the state of agriculture, consumer trends, and government assistance programs. Financial success for any farm sector is often hinged on a thorough understanding of the shortfalls and opportunities within the agricultural marketplace for the agricultural products they produce.

Likewise, it is equally important to monitor the effectiveness of federal programs designed to expand local food systems, as well as identify barriers to local and regional market access due to regulations aimed at small-scale producers. The information from this local food survey would also be helpful to NSAC members at the local and regional level as it will provide guidance on states in need of services and where to conduct trainings for farmers.

This deeper knowledge of the agriculture and consumer marketplace will ultimately strengthen the viability of farms today and into the future, as more and more farms seek to take advantage of this growing agricultural sector.

NSAC and our member organizations strongly support NASS's plan to conduct a survey related to the production and marketing of foods directly from farm producers to consumers or retailers, and would urge the agency to make every effort to finalize this proposed survey tool as quickly as possible to take advantage of the upcoming winter months when farmers are more likely to respond to a national survey.

We thank you for considering our input, and would be happy to provide any needed additional feedback on the survey or other outreach activities.

Sincerely,

A handwritten signature in black ink, appearing to read "Ferd Hoefner". The script is fluid and cursive, with the first name "Ferd" and last name "Hoefner" clearly distinguishable.

Ferd Hoefner, Policy Director
National Sustainable Agriculture Coalition