December 28, 2015

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NASS Clearance Officer

U.S. Department of Agriculture

South Building, Room 5336

1400 Independence Avenue SW

Washington, DC 20250–2024

RE: Notice of Intent to Request to Conduct a New Information Collection – Local Foods Survey, OMB Control Number 0535 – NEW

Several national associations, including farm and rancher membership organizations, trade associations, and organizations promoting producer-to-consumer direct marketing have observed an increase in the use of local and regional marketing of agricultural products. The practice of farmers and ranchers marketing directly to consumers or through intermediaries is an emerging trend in agriculture, yet little data exists about this sector and its marketing practices. We encourage USDA to conduct its proposed “Local Foods Survey” as part of efforts to expand its data collection related to the use of local and regional marketing channels.

There are several indicators of continuing adoption of local and regional marketing by agricultural producers in a range of commodities including livestock, dairy, and fruits and vegetables. The 2012 Census of Agriculture data indicates that direct-to-consumer marketing is ranked 4th in popularity as an agricultural activity. We note that activities like direct-to-consumer marketing contribute to a farm’s overall economic viability: of the farms contributing to $1.6 billion in direct-to-consumer sales in 2007, their total farm sales were $8.7 billion. The USDA AMS reports more than 8,000 farmers markets, yet no accurate estimate exists of the number of farmers involved in these markets. In another example, the 2015 USDA Farm to School Census indicates that 3,640 schools in 44 states make purchases directly from producers or producer cooperatives, yet no similar farm-level data on these sales is collected by USDA. Aside from a few indicators, little other information exists at a national level. There is a need to improve data collection and reporting about producers engaging in local and regional marketing activities to improve private sector services and financing for these producers.

Increased data collection will also benefit the USDA as Congress has increased its responsibilities for this sector of producers. Through the Agriculture Act of 2014, Congress expanded the Farmers Market and Local Food Promotion Program and introduced a new Food Insecurity Nutrition Incentive program that, in part, provides monetary incentives for SNAP consumers for use at producer-to-consumer direct markets and retail stores that promote locally and regionally produced foods. Congress also funded the USDA Farm to School Program through the 2010 Healthy, Hunger-Free Kids Act. Congress is aware of limited data availability and directed the USDA to increase its collection and reporting of “the production and marketing of locally or regionally produced agricultural food products” in Section 10016 of the Agriculture Act of 2014.

The proposed Local Food Survey would improve USDA services by providing information about: producers that sell at farmers markets, utilize intermediated marketing channels to reach grocery stores, and supply farm to school programs; the economic contribution of marketing diversification on farm viability; and the contribution of marketing diversification, such as the local and regional marketing of farm products, to the overall economic impact of the agricultural sector. Also, reporting on the farm typology and demographics of these producers, such as their status as young or beginning farmers, is essential.

USDA is uniquely able to collect and report national-level, farm and agricultural sector level information. This critical information is currently unavailable and hinders service delivery to farmers and ranchers. It is necessary for USDA and the private sector to have better, more comprehensive information on this growing segment of agricultural marketing to adequately provide and improve the delivery of essential services, such as agricultural finance.

Sincerely,

American Farmland Trust

Farm Credit Council

Farmers Market Coalition

National Association of State Departments of Agriculture

National Farm to School Network

National Farmers Union

National Sustainable Agriculture Coalition

National Young Farmers Coalition

Wholesome Wave