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Comment On: CCC-2018-0004-0001
Agricultural Trade Promotion Program

Document: CCC-2018-0004-0006
Comment on FR Doc # 2018-18870

Submitter Information

Name: Ron Young
Submitter's Representative: Kevin Poole
Organization: African American Agriculturist Association

General Comment

See attached file(s)

Attachments

Public Comments Regarding ATPP (AAAA & USDGA)



October 29, 2018

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Robert Stephenson,
Executive Vice President
Kenneth Isley
Administrator, Foreign Agricultural Service
US Commodity Credit Corporation
1120 20th St NW,
Washington, DC 20036

Re: Docket No. FDA-2018-N-2381-0001
"Agricultural Trade Promotion Program"

Dear Secretary Perdue, VP Stephenson and Administrator Isley:

The African American Agriculturalists Association (AAAA) and the United States Disadvantaged Growers Association (USDGA), write today in support of the Agriculture Trade Promotion (ATP) program and its administration by the Foreign Agricultural Services (FAS), and to commend the U.S. Department of Agriculture (USDA) for allowing the public to comment on the new rules related to the ATP program, and appreciates the opportunity to provide comments.

This program's ready response of aid to farmers after the imposition of retaliatory responses from foreign trade partners which harm foreign markets, and definitions of the differences in generic and branded marketing activities and the participants qualified for each are consistent with this goal in directly redressing the problem. To further facilitate this, we encourage the electronic medium for application submissions but also advocate for a print alternative at local USDA offices for cooperatives without access to broadband internet access and further advertisement of this program for them so that they are not denied participation for lack of internet access.

This program's purported goal of developing, maintaining, and expanding commercial export markets is in direct support of the agricultural industries affected by the loss of foreign markets after the implementation of the retaliatory tariffs. By offering aid to organizations with projects dedicated to correcting this loss, the ATP works on behalf of farmers in the United States to maintain their footholds in the industry and particularly in markets abroad. However, many of the affected individuals and the cooperatives they belong to do not have internet access; in fact, nearly 30% of farms in America are lacking in this way.

Although the ATP is best suited to improve the market for agricultural products abroad in the most efficient manner due to the specificity provided in the prescribed rules for its grants, particularly the prioritization of nonprofits, trade organizations, state agencies, and cooperatives for program participation, cooperatives do not have the same access to resources as state agencies in order to even apply for the ATP grants despite being best suited to efficiently and accurately represent the affected farmers' interests abroad in their export

markets. Without an alternative to internet access, the ATP program excludes them; providing an analogue alternative will go a long way to giving them the same opportunity to apply for these grants.

We however call on the FAS to maintain its rules in administering the ATP program and to continue its efforts to return the United States' agricultural industry to its prominent position in global exports. We call on the FAS to consider further steps to continue this growth in foreign markets, including **ensuring equal access** to application materials despite an absence of internet. The programs implemented on behalf of American and other minority and ingenious farmers will only serve to enhance the nation's place in relation to foreign markets and our influence in them, which may be accomplished best by the associations closest to the production and affected interests. The USDA, CCC and FSA need to work collectively with the agriculture community to ensure that all farmer's crops are represented in marketing initiatives, especially socially disadvantaged farmers who are often hurt the most in times of economic downturn and trade disputes. Consider these farmers when moving forward with rulemaking and regulatory action. Without consideration for setbacks, technical disadvantages, and the need for alternative and strategic engagement these farmers require, FAS and the USDA are by inadvertently denying these farmers equal access to the great benefits these programs can provide.

Thank you for your consideration

Sincerely,

Kevin Poole
Vice President
African American Agriculture Association

Ron Young
Director of Policy & Legislative Affairs
United States Disadvantaged Growers Association