



Healthy Plants • Healthy World

June 7, 2010

Re: Docket Number NIFA–2010–0001

Dear Dr. Beachy:

The American Phytopathological Society (APS) appreciates the opportunity to comment on the Agriculture and Food Research Initiative (AFRI) 2010 Requests for Applications (RFAs) and to make suggestions for the 2011 and future RFAs. APS was founded in 1908 and is the premier educational, professional, and scientific society dedicated to the promotion of plant health and plant disease management for the global good. The Society represents nearly 5,000 scientists whose work advances the understanding of the science of plant diseases and its application to plant health. The APS has served as an unbiased resource on plant health for USDA and other Federal agencies for many years. The progress made in plant health programs in the United States through support of research, teaching, and extension from Federal, state and private sources has facilitated the sustainability and profitability of America's plant production industries.

In response to earlier opportunities for comment on the NIFA-AFRI RFAs, APS provided written (<http://www.apsnet.org/members/ppb/APSResponsestoPolicyIssues/APSStakeholderApril2010.pdf>) and oral (<http://www.apsnet.org/members/ppb/APSResponsestoPolicyIssues/stakeholdercomments.asp>) remarks summarizing aspects of AFRI that we enthusiastically support and those areas where we have serious concerns. In this letter, we reiterate and expand on the broader contexts of our thoughts and concerns.

APS supports NIFA's broad research themes.

APS supports the broad research themes covered in the AFRI RFAs that address the availability of safe and secure food, fiber, feed, and natural resources for the USA and globally. We strongly support funding of research directed towards understanding and finding solutions for: (a) food safety through collaboration of food scientists and plant microbiologists, (b) the biology of plant-associated and soil matrix microorganisms and their roles in agricultural productivity, (c) the management of food and fuel production in a changing environment, and (d) global food security. In addition, we support increased opportunities for education and training of undergraduate, graduate, and postdoctoral students with expertise in agricultural and related sciences. We are encouraged by and support increased efforts emphasis on delivery of research results to our stakeholders, including growers, consultants, other practitioners, and regulatory agencies. The APS is sympathetic to the difficulty of making major impacts on important societal issues within a constrained budget. To that end, we have long been a proponent of increased funding for competitive programs within USDA. We appreciate that the agency is trying to provide larger and longer grants within the budget constraints. We urge and support the continuation and expansion of interagency efforts where possible and relevant to increase resources to address these broad research themes.

APS urges continuous support of broad research topics fundamental to agricultural stability.

A major concern of APS members is that the current AFRI-RFAs do not focus on research that adequately supports the broad themes described for NIFA. The AFRI-RFAs focus on a constantly changing set of highly specific research topics that are too narrow to ensure continued safety and security of our agricultural resources, and in particular, to support the long-term stability of the diverse research community needed to address the problems of agriculture. The consequences of this limited approach will be that many scientists will abandon or never enter essential agricultural research and the expertise and technologies needed to maintain and advance U.S. agricultural in the face of changing climate, energy and environmental challenges will be lost.

The impact of discontinuous or sporadic funding of knowledge areas foundational to plant health sciences is exemplified in the singular focus this year on diseases caused by one group of pathogens, in particular, the fungal-like Oomycetes. Although Oomycetes are important pathogens, the true fungi cause more than two-thirds of infectious plant diseases and, in fact, are responsible for the most agricultural losses due to disease. In the broader context, all economically important crops are affected by one or more fungal diseases, or by diseases caused by other pathogen groups. Rotating funding opportunities on the basis of pathogen groups rather than on the basis of the biology and etiology of the diseases will restrict advances in the general knowledge of disease and disease prevention as well as impact the research community and knowledge base. A major concern is that, without even the potential for competitive funding support, researchers addressing 'out-of-cycle' areas or who are not part of the few large groups selected for funding within a focus area may not survive. We believe that the cycling approach of highly specific topics will not attract or retain the talent needed to solve pressing agricultural problems. Secondly, we are concerned that such an approach will negatively impact the highly respected peer review process of competitive programs in USDA because potential expert reviewers will be excluded as they will have competing proposals. **APS encourages NIFA to develop AFRI RFA's that are directed toward more balanced, recurring priorities that will better address the challenges of fundamental agricultural research and will support the vibrant and integrated research communities needed to address both current and future challenges.**

APS urges the solicitation of novel approaches to solving agricultural problems.

APS is concerned that the current AFRI-RFAs are too prescriptive, and as such, discourage the submission of proposals with creative and novel approaches from the scientific community. Such restrictive RFAs unnecessarily direct scientific approaches, restrict creativity, and may in the end discourage creative approaches that could resolve the agricultural problem. Transformative ideas and approaches are needed to resolve the challenges defined within NIFA's broad priorities. Historically, solutions have occurred through the creativity of investigators and not by agency directives. Peer review panels, feedback from the broad community of agricultural scientists, and discussions with representatives of scientific societies, industry organizations, and private companies have helped guide funding umbrellas that allowed past advances in plant sciences. APS encourages broad solicitation of input from scientists for the development of rational and relevant programs for the next RFAs.

In summary, APS encourages NIFA to hold true to its unique mission in the portfolio of Federal competitive funding. This will ensure that the broad scientific community responsible for protecting the health of our nation's plant production systems will have needed resources to achieve that goal. We urge NIFA to consult the scientific community during development of future AFRI RFA's to ensure that they better address the challenges of fundamental agricultural research and support the vibrant and integrated research communities needed to address both current and future challenges. We encourage and support interagency efforts to address priority issues relevant to the entire Federal funding portfolio. Finally, we are ready to work with the you and the leadership at USDA to ensure that overall funding for research at USDA and other agencies is increased significantly to address critical US and international needs.

Again, thank you for the opportunity to provide comments and input.

Sincerely,



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President-Elect
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