



UNITED TO GROW FAMILY AGRICULTURE

September 18, 2018

The Honorable Sony Perdue  
Secretary of Agriculture  
U.S. Department of Agriculture  
1600 Independence Ave SW  
Washington, DC 20250

Dear Secretary Perdue,

On behalf of National Farmers Union's 200,000 family farmer, rancher and rural members, I write in opposition to the U.S. Department of Agriculture's (USDA) proposed reorganization and relocation of the Economic Research Service (ERS) and the National Institute of Food and Agriculture (NIFA). Due to concerns regarding how the move would impact the agencies' functions and the lack of information surrounding the Administration's justifications, the NFU board recently adopted a position against the proposal.

NFU has long been concerned by reduced investment in public agricultural research. Our member-driven policy argues that the reduction in funding for public research and "increase in private research has reduced the sharing of information and increased costs of production inputs." ERS and NIFA play a key role in helping farmers and ranchers improve productivity, natural resource stewardship, and access to global markets and trade. As the economic and environmental challenges facing family farmers and ranchers mount, it is critical that USDA prioritize the work of the agencies.

The process to relocate these agencies has lacked meaningful public input that would better inform any final decision. Additionally, the USDA should be more forthcoming and transparent with the metrics it utilized in developing the current proposal. Given the available information, NFU has several concerns.

The proposal does not adequately address how USDA will improve the agencies' effectiveness in serving family farmers and ranchers. While USDA cites current difficulty with employee recruitment as a justification, we are concerned that the move will lead to a large loss of knowledgeable and experienced staff. Such a loss could cause disruptions in NIFA's program delivery, and ERS's reporting and research. Any disruption in the execution of these agencies' functions would have a significant detrimental impact on family farmers and ranchers.

We are also deeply concerned that the relocation and reorganization could jeopardize each agency's objectivity. The Chief Economist's role is to advise the Secretary on the economic impact of USDA's policies and programs, while ERS's mission is to conduct "objective economic research" for the benefit of the public. Placing ERS directly under the Chief Economist's purview may diminish the scientific

integrity of the agency's research. Relocating NIFA at or near entities applying for grants may also create conflicts of interest in the grant awarding process.

Absent strong justification for how the move will improve the agencies' functions and benefit family farmers and ranchers, we oppose the reorganization and relocation of ERS and NIFA. We urge you to reconsider the proposal and initiate a more thorough public input and vetting process.

Sincerely,

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

Roger Johnson  
President