



TENNESSEE FARM BUREAU FEDERATION

June 21, 2021

Agricultural Marketing Service
United States Department of Agriculture
Room 2055-S, STOP 0201
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Washington, D.C. 20250-0201
RE: AMS-TM-21-0034

The Tennessee Farm Bureau Federation (Farm Bureau) represents a diversity of commodity producers across the state and is the largest general farm organization in Tennessee. The United States Department of Agriculture's (USDA) plan to invest pandemic-related stimulus dollars to strengthen critical supply chains through the Build Back Better initiative is a practical effort to support farmers and our nation's resiliency by reinforcing local and regional food systems, developing market initiatives, and strengthening the agricultural workforce. On behalf of our member farmers, we welcome the opportunity to provide comments in an effort to improve food system supply chains for the production, processing, and distribution of agricultural commodities and food products. We request USDA consider these comments along with comments submitted by the American Farm Bureau Federation.

Agriculture is deeply rooted in the history and economy of Tennessee. We are proud of the exceptional relationships among Tennessee farmers, the Tennessee Department of Agriculture, land-grant universities, state government, Farm Bureau, and other agriculture organizations which continue to enhance Tennessee agriculture's rich history of excellence. The unified efforts of this community to improve the lives of both farmers and consumers serve as a model for how we believe our nation's food system supply chains should operate. We believe the following is a result of these relationships:

- The *2017 Census of Agriculture* indicates there are 69,983 farms in Tennessee, of which, 98 percent are family farms.
- According to *An Economic Report to the Governor of the State of Tennessee for 2021* (Report), in 2018, the agri-forestry complex directly contributed (without multiplier effects) \$51.5 billion in economic activity to the state's economy, adding 181.3 thousand jobs.
- When accounting for multiplier effects, the agri-forestry complex added \$79.3 billion to Tennessee's economy or 10.9 percent of the state's economic activity, accounting for 339.4 thousand jobs or 8.4 percent of all jobs.
- The Tennessee Department of Agriculture in conjunction with the Tennessee State University and University of Tennessee Extension services provide beginning farmer resources such as the Tennessee Beginning Farmer Outreach Program and MANAGE Program.
- The Agricultural Enterprise Fund is an incentive program with a priority of job creation and economic development by facilitating agricultural development in Tennessee.
- The Tennessee Agricultural Enhancement Program provides cost share dollars to agricultural producers for the purpose of making long-term investments in Tennessee farms and communities.

- The Tennessee Beef Promotion Program and Corn Promotion Program collect state-specific check-off dollars on these commodities which are sold in the state to help support in-state research, education, market development, marketing, advertising, and other promotions to increase production, consumption, use, and sale of beef and corn in the state.

Food Production

While some commodity prices have improved in recent months, profitability, labor, access to technology, and regulatory overreach remain major concerns for Tennessee farmers in terms of food production.

Profitability

A major obstacle for all farmers— established, beginning, or socially disadvantaged— is profitability. For every \$1 Americans spend on food, just 14.3 cents go to farmers. As the first link in the food supply chain, farmers do not set the price of their products and assume incredible risk with every planting and each herd of animals. All farmers are aware of the financial risk involved in their work, however in order maintain a resilient supply chain in the United States, farmers should receive maximum profitable prices for their commodities.

We support:

- Research for the development of effective risk management tools for hedging input costs.
- Research aimed at reducing overall inputs needed to sustain a profitable farming operation.
- Efforts to provide information to farmers on proven means of improving the efficiency of inputs.
- Initiatives to lower production costs and remain competitive worldwide.

We oppose:

- Any attempt to mandate low input methods of farming.
- Requiring low input methods as a condition of participation in government farm programs.
- Programs that are used by organizations whose goal is to eliminate or control commercial agricultural practices.

Labor

Farmers have long experienced difficulty in obtaining workers who are willing and able to work on farms and in fields. Jobs in agriculture are physically demanding, conducted in all seasons and are often transitory. To most U.S. residents seeking employment, these conditions are not attractive. A number of studies document this fact, and farm worker representatives have acknowledged this reality in congressional testimony.

We believe a well-educated population leads to a skilled workforce. We support education, workforce development, and job opportunities for U.S. citizens, however for many prospective workers from other countries, these jobs present real economic opportunities. In times of labor shortages, farmers have relied on migrant workers through H-2A and on workers who appear to

have legal status to be working in the United States. Farm Bureau supports proposals providing access to a legal and stable workforce for agriculture's needs now and in the future. This long-term workforce stability will come through the creation of a new streamlined, flexible visa program following how the domestic market operates.

Technology

Farmers embrace technology to be more efficient, economical and environmentally friendly. Today's farmers are using precision agricultural techniques to make decisions impacting the amount of fertilizer a farmer needs to purchase and apply to the field, the amount of water needed to sustain the crop, and the amount and type of crop protection products the farmer may need to apply.

Farms need access to the appropriate pesticides, fertilizers and seeds to continue producing more food on fewer acres. This also includes innovation like biotechnology, which improves soil health, helps farmers better handle drought, and boosts nutritional values of crops. It is imperative USDA works closely across the federal government to ensure the process in which pesticides are regulated, enables access to a wide variety of crop protection tools. Additionally, it is critical USDA urge EPA to work expeditiously to bring new products to market, as pest threats and plant needs change overtime due to issues of pest and weed resistance, the development of new plant diseases, and the weather.

Farmers rely on broadband access to manage and operate successful businesses, the same as small businesses do in urban and suburban America. Access to broadband is essential for farmers to use precision agriculture techniques, follow commodity markets, communicate with customers, gain access to new markets around the world, and increasingly, for regulatory compliance.

Regulatory

Farmers are faced with a multitude of requirements which seldom provide clarity and consistency. Often, these requirements are the result of federal regulations; sometimes they arise from court decisions. No matter how they develop, the result often can be controversial. We must avoid counterproductive regulations which could have the unintended consequence of stifling productivity and putting food system supply chains at risk. Regulations should not limit agricultural practices without strong scientific and economic justification.

U.S. farmers have long been at the forefront of climate-smart farming, utilizing scientific solutions, technology, and innovations to raise crops or care for livestock, however measuring these initiatives are not always a farmer's immediate priority. These efforts are designed to protect soil and water, efficiently manage manure, produce clean and renewable energy, capture carbon, and improve sustainability. Over two generations, farmers have increased productivity by 287 percent, while using the same resources. In essence, we are doing more with less. Efforts to address climate change should rely on accessible, measurable results and focus on voluntary, incentive based, adaptive management for continual improvements rather than a rigid set of practices or regulations.

Food Processing

Many farmers have experienced limited access to meat processing facilities as Tennessee's shortage of slaughter capacity has led to bottlenecks in the supply chain. We encourage efforts

to find solutions for the shortage of USDA inspected processing facilities. These solutions should include efficient and cost-effective ways for custom processing plants to become federally compliant. Producers need consistent access to a well-run, federally compliant, flexible, and profitable facility to link independent livestock producers to end consumers. With customized value-added products, we have an opportunity to fill the ever-growing demand for locally produced products. We encourage investment in, and development of, new independent, local, and regional packers and technical education for a skilled and reliable workforce for meat packing.

While Tennessee lacks meat processing capacity, the state does have a strong network of food manufacturing facilities. However, many commodity inputs for these facilities are sourced from other regions of the country. A potential opportunity to strengthen local and regional food systems is meeting the needs of these established facilities with local producers growing desired inputs. Tennessee's diverse soil types and climactic conditions host a wide variety of commodities which are attractive to many manufacturing facilities globally. Farmers would benefit with expanded market opportunities while food supply chain systems would become more resilient through this sustainable initiative. In addition, this could lead to more affordable, local, and nutritious options for consumers.

Food Distribution

Infrastructure

With eight border states and access to markets by water, road, or rail, it is important to consider the need for maintenance and improvement of our state's infrastructure. Tennessee farmers rely heavily on the Mississippi and Tennessee rivers, the state's broad highway and interstate system, and short-line and larger rail networks for markets and food distribution. Investing in infrastructure for food distribution and aggregation is a wise investment for farmers and consumers and it is imperative to ensuring a reliable, flexible, and responsive distribution of food. With 95 percent of the world's consumers outside of the U.S., our infrastructure should aid in reaching markets domestically and internationally.

Farmers depend on broadband just as they do highways, railways and waterways to ship food, fuel and fiber across the country and around the world. Many of the latest yield maximizing farming techniques require broadband connections for data collection and analysis performed both on the farm and in remote data centers. However, 29 percent of U.S. farms have no access to the Internet according the USDA report, "Farm Computer Usage and Ownership, 2017."

Markets

Farm Bureau supports free markets. New alliances, cooperatives and other organizational structures should be explored as marketing initiatives to increase the farmer's net income. All agricultural schools, private industries, and agencies should assist farmers in overcoming obstacles and developing new markets. Direct, niche, and other marketing opportunities should be pursued so producers can receive a greater share of the retail price of the product. Market identification for locally produced products creates an appreciation by consumers, a sense of connection among buyers and sellers, and ultimately economic opportunities for Tennessee farmers. We support policies and actions which enhance and maintain a competitive domestic

processing (value-added) industry and infrastructure for U.S. produced agricultural commodities.

Consolidation and the subsequent concentration within the U.S. agricultural sector have adverse economic impacts on farmers. Congress should review existing statutes, develop legislation where necessary and strengthen enforcement activities to ensure proposed agribusiness mergers and vertical integration arrangements do not hamper producers' access to inputs, markets, and transportation. USDA should be empowered to investigate mergers, consolidation, or concentration of agricultural input suppliers, processors, and retailers for antitrust or anti-competitive activities.

Consumer Education

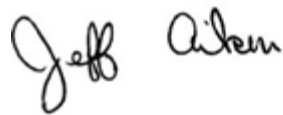
Agriculture provides society numerous benefits including, but not limited to food security, a safe and healthy food supply, environmental benefits, and community stability. People want to know where their food comes from, and we welcome the opportunity to meet the need. The interest in credible resources on food production and distribution has increased with the continuation of the COVID-19 pandemic. The role of those who work in agriculture is of value to all communities and the nation as it provides jobs for more than 21 million Americans or 11 percent of the total workforce. Technological advances play a major role in maintaining both the quality and quantity of our food supply and it is important for the consumer to understand agriculture is committed to providing a safe, high quality food supply at a reasonable price for all consumers to enjoy.

Conclusion

Farm Bureau is committed to finding solutions to the challenges of bolstering local and regional food systems, developing market initiatives, and strengthening the agricultural workforce while striving to find opportunities for farmers and all consumers. Only in working together can common sense solutions be achieved to improve resiliency of our food system supply chain and make our country stronger without enacting policies hampering the productivity of America.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Jeff Aiken". The signature is written in a cursive, slightly slanted style.

Jeff Aiken
President