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(Appendix B in the Supply Chain Comment)

Written comments as submitted by RAFI-USA to AMS on March 31, 2021 concerning Coronavirus Response Grants related to CAA Funding

Here is the text of RAFI-USA's comment:

Rural Advancement Foundation International - USA (RAFI-USA) is a farmer advocacy nonprofit organization located in Pittsboro, NC. Our mission is to challenge the root causes of unjust food systems, supporting and advocating for economically, racially, and ecologically just farm communities.

Over the last year we have stayed in close communication with the farmers we serve, the majority of which are small to mid-scale. This included collecting survey responses from more than 200 farmers of color on what the top impacts of COVID-19 were for their operation. This included:

- 1) On-farm activities curtailed (rural broadband, agritourism, lack of labor)
- 2) Decrease in sales, market disruption
- 3) Food safety concerns (lack of PPE, need for GAP certification)

In this survey, we also asked farmers what their top needs were for the success of their operation. The top three requested needs were:

- 1) Market support and access
- 2) Online marketing, media, and tech tools
- 3) Business planning

In addition to collecting feedback from farmers, RAFI-USA also distributed over 250 grants to farmers over the past year whose farm operations were hit hard by COVID-19. The grants helped cover household expenses. We were not able to meet the full need.

RAFI-USA has also awarded emergency COVID-19 mini-grants to over 100 faith-based food pantries or feeding ministries during the pandemic. The most consistent feedback we hear from those organizations is the need for more or better refrigeration capacity, which would allow them to supply their clients with more fresh and locally sourced food.

While farmers are undoubtedly still recovering from the disruptions caused by COVID-19, they are simultaneously looking towards building resilience into their operations so they can weather future natural or public health disasters. The recommendations included in this comment not only reflect what farmers, farmers market, and food pantries need in order to recover from COVID-19; they also reflect what is needed in order to build stronger, more resilient food systems.

We ask that any new programs be designed so farmers, food enterprises, local markets, and food pantries can access necessary, equitable relief. This is especially true for the most-vulnerable and most-impacted farm and food enterprises. Uses of funding should include:

- Allow for farms, farmers markets, processors, and food pantries to receive a grant for any COVID-19 expenses retroactively from March 2020 to the present. Ensure the following expenses and categories of expenses are covered/eligible:
 - New ecommerce platforms
 - Personal Protective Equipment
 - Packaging and labeling materials
 - Signage
 - Food safety practice upgrades
 - Food safety certification
 - COVID-19 testing materials and services
 - Dry or Cold storage, other equipment and upgrades
 - Hand washing equipment and materials
 - Cleaning supplies
 - Temperature screening equipment
 - Food delivery costs (fuel and maintenance); including increased travel required for meat processing
 - Expanding or restructuring processing lines
 - Purchasing or leasing temporary space or holding pens
 - Transportation services or equipment
 - Staff time for implementing COVID-19 shifts, protocols, etc.
 - Other measures to protect workers, or aid in preventing the spread of, COVID-19, including providing for worker transportation, housing, and childcare
- Provide grant funding or cost-share support for infrastructure that will strengthen farms, farmers market, and food pantries' resilience for future pandemic, natural disaster, or marketplace-based disruptions. Ensure the following expenses are eligible for funding:
 - Dry or Cold storage, other equipment and upgrades
 - Expanding or restructuring processing lines
 - Packaging and labeling materials
 - Signage

- Food safety practice upgrades
- Food safety certification (i.e. GAP Certification)
- Rural broadband necessary for ecommerce activities
- Solar panels and other infrastructure necessary to make use of on-farm natural energy/heating resources
- Allow farmers markets to seek reimbursement for lost revenue due to forced closures and cancellations of community events and decreased vendor stall fees due to social distance requirements in market arrangements. This should be no less than 80% of income lost in 2020.

In addition to these eligible expenses, the following eligibility, application, and certification criteria should be followed:

- Ensure entities can apply for grants from \$5,000 up to at least \$75,000 in the first round of funding availability with the option to apply for subsequent rounds of grant funding if all eligible entities that applied have received funds in the initial application round.
- Simplified, self-certification based application which does not require documentation to receive initial payments, only for verification if USDA requires at a later date.
- Eligible entities should include small farms, small retailers, cooperatives, and other businesses in the food supply chain.
- Include a 10% reservation of dedicated funds for BIPOC producers, processors, or food business owners to ensure fair access to grants with any funds not required to meet demand after 180 days to be returned to the pool of general funding.
- Include 10% reservation of funds for very small and small entities and farmers markets to ensure fair access to grants with any funds not required to meet demand after 180 days to be returned to the pool of general funding.
- Ensure all farmers markets are eligible and are not limited by the diversity of business entity classification among markets
- Make available a national hotline for all eligible entities to receive application assistance as well as a dedicated online resource and/or webinars to aid in outreach efforts. Create a mechanism for outreach organizations to provide constructive feedback to AMS to ensure proper distribution of funds.

We appreciate the opportunity to share feedback with AMS on this incredibly important funding!