

THE U.S. DEPARTMENT OF AGRICULTURE  
AGRICULTURAL MARKETING SERVICE

Request for Information: Specialty  
Crops Competitiveness Initiative

Docket No. AMS-SC-23-0073

COMMENTS OF THE  
CENTER FOR SCIENCE IN THE PUBLIC INTEREST

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The Center for Science in the Public Interest (CSPI) submits these comments in response to the U.S. Department of Agriculture's (USDA) Request for Information on Specialty Crops Competitiveness Initiative.

CSPI is a non-profit consumer education and advocacy organization that has worked since 1971 to improve the public's health through better nutrition and food safety. CSPI helped to lead efforts to win passage of the Nutrition Labeling and Education Act, the Healthy, Hunger-Free Kids Act, the Food Safety Modernization Act, chain restaurant menu labeling, and the Food Allergen Labeling and Consumer Protection Act. CSPI also publishes Nutrition Action (NA) and is supported by the subscribers to NA, individual donors, and foundation grants. CSPI is an independent organization that does not accept any corporate donations.

CSPI appreciates the USDA's commitment to provide more economic opportunities for American specialty crop farmers. We highlight two specific opportunities for your consideration:

1. The Gus Schumacher Nutrition Incentive Program (GusNIP): GusNIP is designed to incentivize the purchase of fruits and vegetables by shoppers with low incomes while also supporting American farmers by prioritizing direct-to-consumer sales and locally grown produce. GusNIP creates a powerful ripple effect through local economies with a high economic multiplier effect. For every dollar spent in a healthy food incentive program like GusNIP, up to \$3 in economic activity can be generated.<sup>1</sup>

Additionally, research suggests that program participants consume more fruits and vegetables than the average American adult.<sup>2</sup>

USDA could do more to support the specialty crop industry by expanding the GusNIP program to fully meet the demand. More than 600 specialty crop farmers and food and health leaders are currently calling for the expansion of the program through the Farm Bill.<sup>3</sup> Currently, less than 1% of all Supplemental Nutrition Assistance Program (SNAP) participants receive GusNIP benefits,<sup>4,5</sup> but if all SNAP households were to be able to participate in the program at the \$20 per month level (the minimum benefit cap amount used in some incentive programs, although

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<sup>1</sup> Thilmany *et al.* The Economic Contributions of Healthy Food Incentives.

[https://www.spur.org/sites/default/files/2021-02/economic\\_contributions\\_incentives\\_2\\_2\\_21.pdf](https://www.spur.org/sites/default/files/2021-02/economic_contributions_incentives_2_2_21.pdf). Accessed March 5, 2024.

<sup>2</sup> Nutrition Incentive Hub. GusNIP Year 3 Impact Findings. <https://nutritionincentivehub.org/gusnip-ntae-y3-impact-findings>. Accessed March 5, 2024.

<sup>3</sup> Fruit and Vegetable Incentives. More Than 600 Leading Organizations Urge Congress to Strengthen and Expand Successful Nutrition Incentives, Produce Prescriptions in 2023 Farm Bill. <https://fruitvegincentives.org/latest/more-than-600-leading-organizations-urge-congress-to-strengthen-and-expand-successful-nutrition-incentives-produce-prescriptions-in-2023-farm-bill/>. Accessed March 5, 2024.

<sup>4</sup> Gretchen Swanson Center for Nutrition. Gus Schumacher Nutrition Incentive Program Training, Technical Assistance, Evaluation, and Information Center (GusNIP NTAE): Impact Findings Year 3. 2023. <https://nutritionincentivehub.org/media/2uwl3ch/gusnip-y3-impact-findings-report.pdf>. Accessed March 5, 2024.

<sup>5</sup> U.S. Department of Agriculture. Supplemental Nutrition Assistance Program. <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-4fymonthly-2.pdf>. Accessed March 6, 2024.

the benefit cap is usually much higher), specialty crop sales through the incentive program would increase by over \$5 billion.<sup>6</sup>

2. The Emergency Food Assistance Program (TEFAP) Farm to Food Bank (FTFB) Projects: TEFAP FTFB Projects provide a key opportunity to support the U.S. specialty crops industry by establishing relationships between emergency feeding organizations and agricultural producers, processors, and distributors. These projects provide a pathway for quality local produce to be donated and distributed through emergency feeding organizations to families experiencing food insecurity.<sup>7</sup> Over 50 percent of states received funding through TEFAP FTFB in FY 2023.<sup>8</sup> USDA can further assist the U.S. specialty crops industry by supporting the expansion of the program to more states. In addition, USDA can support legislation to allow FTFB project funds to be used to purchase foods, instead of limiting funds to being used only for the harvesting, processing, packaging, or transporting of donated foods.

Thank you for your consideration.

Sincerely,

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<sup>6</sup> John *et al.* Advancing Equity in the Farm Bill: Opportunities for the Gus Schumacher Nutrition Incentive Program (GusNIP). *Nutrients*. 2023 Dec; 15(23): 4863.

<sup>7</sup> U.S. Department of Agriculture. TEFAP State Plan Requests and Allocations for FY 2023 Farm to Food Bank Projects. December 18, 2023. <https://www.fns.usda.gov/tefap/fy23-farm-food-bank-projects-state-plan-requests-allocations>. Accessed March 4, 2024.

<sup>8</sup> U.S. Department of Agriculture. FY 2023 Farm to Food Bank Project Summaries. December 1, 2022. <https://www.fns.usda.gov/tefap/fy-2023-farm-food-bank-project-summaries>. Accessed March 4, 2024.