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AFRI Competitive Programs (CP) Unit
National Institute of Food and Agriculture
U. S. Department of Agriculture
STOP 2240
1400 Independence Avenue, SW
Washington, DC 20250-2240

Docket Number NIFA-2010-0001

We, on behalf of the American Association of Avian Pathologists (AAAP), are writing in response to Docket Number NIFA-2010-0001 regarding the Agriculture and Food Research Initiative (AFRI). AAAP is a non-profit organization founded in 1957 which is composed of about 1000 professionals dealing with poultry health and safety issues. AAAP provides forums for the exchange of research information through its conferences and publications and has members in all sectors of poultry health. As scientific leaders in the field of avian diseases we welcome the opportunity to comment on AFRI, one of the Department of Agriculture's most important research programs. AAAP wishes to fully endorse the comments of the Federation of Animal Science Societies (FASS) in their letter to the docket dated June 2, 2010, and to add these additional observations concerning funding for poultry production and disease research.

AAAP is very appreciative of the recent increased emphasis on support for agricultural research and for the efforts of USDA to engage stakeholders and the research community in determining the future direction of our national research program. However, we share the concerns of FASS that, while the overall AFRI budget may be increasing, the funding allocated to animal sciences in general may actually be decreasing. As an organization dedicated to the advancement of agricultural animal health, we are concerned that poultry production and disease research may be particularly impacted. In the Foundational RFA for FY 2010 in the area of animal health (A1221), only two specific diseases (Infectious Laryngotracheitis and E. coli peritonitis) are targeted for funding; there is no targeted funding for any turkey disease. The topics specified in the area of animal reproduction (A1211) are clearly mammalian, while reproduction in poultry (and especially turkeys) is no less problematic. In 2008, according to the USDA Current Research Information System (CRIS), of the total \$5,212,025,000 allocated by USDA REE, \$144,208,000 or 2.77% was allocated to projects relating directly to poultry, while \$592,164,000 or 11.36% was allocated to beef, dairy, and swine projects, a ratio of 1:4. Poultry and eggs in the 2007 Census of Agriculture accounted for 12.5% of all agricultural sales while cattle and calves, dairy products and hogs accounted for 37.4%, a ratio of 1:3. Poultry and eggs are second only to cattle and calves in farm gate receipts from livestock, and research should be funded proportionally.

The negative impact of the current funding structure, which emphasizes large multi-disciplinary, multi-institution projects, on individual investigators and new investigators is particularly germane to poultry, where poultry science and avian disease departments have become increasingly fewer and smaller and much of the research in this field is conducted by individuals and smaller groups. Younger investigators who have not developed the network necessary for that approach, and those working in highly specialized but nevertheless highly important areas are penalized and their potential contributions reduced. The proposed practice of calling for a series of targeted proposals in sequential years (E. coli in 2010, salmonella and campylobacter in 2011, and other pathogens in 2012) will further impact these smaller research programs and discourages sustained research and the development of expertise in these critical areas. Restricting all funding to a targeted list of specific topics disenfranchises researchers with established programs outside of those areas and may thereby stifle the submission of novel ideas or projects to address rapidly emerging but highly critical issues that were not recognized in advance of the determination of the priorities. The NIH model of providing for the submission of proposals outside of the targeted areas allows for greater innovation and flexibility and the ability to address rapidly emerging problems.

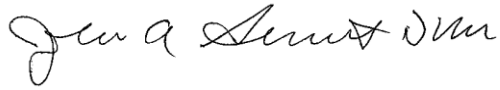
We also wish to reinforce the observation by FASS of the ever-mounting pressures on animal agriculture in general and poultry production in particular regarding escalating energy costs, competition for feedstuffs (particularly from mandated ethanol use targets), environmental concerns and regulations, animal welfare issues, emerging diseases, foreign competition, non-tariff trade barriers, antibiotic use issues, and food safety. A robust and nimble research program driven by investigators close to these industry issues is critical to maintaining the sustainability of poultry production in the U. S.

Finally, we emphasize the unique position of poultry among the animal industries in addressing the Challenge Areas. Poultry are currently the most efficient converters of vegetable feedstuffs into high quality protein products, after aquaculture species. The rapid generation interval of poultry species allows extremely rapid selection to meet the needs of diverse husbandry systems. Poultry meat and eggs are a high-quality, low fat component of a balanced diet. Poultry production currently faces considerable challenges in meeting food safety concerns and the role of poultry in emerging zoonotic diseases, both areas ripe for continued focused research from farm to fork. Poultry research should occupy a prominent position among the projects in the Challenge Areas of Global Food Security, Food Safety, and Childhood Obesity Prevention and Nutrition.

A recent review of funding resources for poultry disease research by the AAAP Research Priorities Committee confirmed that USDA AFRI funding is by far the primary source of support. Adequate AFRI funding for poultry research is therefore critical to the continuing advancement of poultry production in the U. S. and to the recruitment of the next generation of researchers in this field. A robust, well-funded competitive grants program for poultry research that ensures the competitiveness and continued improvement of domestic poultry production will yield tremendous benefits to consumers and producers and ensure a safe, adequate, affordable supply of poultry and eggs for domestic and international consumption.

The AAAP appreciates the opportunity to engage the agency with our needs and concerns and looks forward to a continuing partnership in determining the future direction of our joint research efforts.

Sincerely,

Handwritten signature of John A. Smith, DVM in black ink.

John Smith, DVM, MS, MAM, Diplomate ACVIM, ACPV
Chair, AAAP Research Priorities Committee

Handwritten signature of Jagdev Sharma in black ink.

Jagdev Sharma, B.V.Sc., Ph.D.
President, American Association of Avian Pathologists