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

Docket Number NIFA-2010-0001

To Whom It May Concern:

The American Society for Nutrition (ASN) appreciates this opportunity to submit comments on the USDA National Institute of Food and Agriculture (NIFA) Agriculture and Food Research Initiative (AFRI) Request for Applications for Fiscal Year (FY) 2011. With a membership of nearly 4,000 active scientists, the ASN is the premier research society dedicated to improving the quality of life through the science of nutrition. We bring together the world's top researchers, clinical nutritionists and industry to advance our knowledge and application of nutrition for the sake of humans and animals. Our focus ranges from the most critical details of research and application to the broadest applications in society, the United States and around the world. Our members have been actively involved in the USDA competitive grants program, from being the recipients of such grants to serving as reviewers of proposals.

ASN strongly advocated for the establishment of a NIFA in its recommendations to Congress for the Farm Bill, stating that such an entity would provide a clearer organizational mechanism to support research at USDA. ASN has been especially interested in the Agriculture and Food Research Initiative (AFRI), which funds cutting-edge, investigator-initiated agricultural research on key issues of timely importance on a competitive, peer-reviewed basis. ASN stated in 2009 and still believes that research that informs our understanding and implementation of a health-promoting lifestyle and dietary practices that optimize human health and prevent disease should be a priority at USDA.

Both basic and applied nutrition research are critical to America's health and economy. We understand that section 7406 of the Food, Conservation, and Energy Act of 2008<sup>1</sup> directs 60 percent of the AFRI funds allocated to research activities to basic research, and 40 percent toward applied research. However, the RFAs for FY 2010 are highly focused on collaborative, multidisciplinary teams of researchers. While we are supportive of collaborative research, including inter-departmental coordination, we want to stress that this should not be at the expense of Principal Investigator-initiated grants. A strong emphasis on individual investigator-initiated research has been proven to be the most successful model for the nation's health and agricultural research enterprise, and we are

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<sup>1</sup> Public Law 110-246

concerned that a predominant focus on integrated programs may erode the benefits received from long-term, individual investigator-initiated grants.

ASN is concerned with other elements presented in the FY 2010 Request for Applications, which need to be addressed in the FY 2011 AFRI program solicitations. Of utmost concern is that the exclusive targeting of funding to childhood obesity prevention is limiting and represents a gross imbalance that could affect the potential for future scientific breakthroughs achieved in many areas of nutrition. By minimizing the scope of the program in nutrition to one issue, the program inadequately funds other opportunities where research could lead to future health advances in the prevention of chronic diseases, improved nutrition for all ages, and better quality of life. The knowledge gaps previously identified are compounded by this narrow focus and will only broaden unless the next Request for Applications takes the need for a broad portfolio of agricultural research into account.

There are many areas of nutrition research that are important to public health that would not be touched by this exclusive targeting. For example, ongoing research of zeaxanthin, a carotenoid found in bell peppers and corn, and its effect on age-related macular degeneration has been funded under the USDA National Research Initiative, which was not reauthorized. ASN believes that this type of research, which can be called “bench to community,” is underappreciated and neglected by the AFRI’s current emphasis on behavioral research. AFRI needs to continue supporting basic research like that on zeaxanthin, which could be a tool in preventing age-related macular degeneration, a leading cause of blindness in the U.S.

Other examples of recently funded research projects associated with leading university nutrition departments that were supported by the NIFA AFRI mechanism and are now without support include:

- Dietary lipid as a primary modulator of carotenoid bioavailability from vegetables
- Fish consumption that will reduce mercury intake while optimizing long-chain omega-3 fatty acid intake
- Dietary protein intake and muscle gene expression
- Lasting effects of developmental iron deficiency

Fundamental agricultural research, which has led to the development of better food programs to feed not only the U.S, but the world, could suffer by narrowly targeting childhood obesity prevention. While obesity is a serious problem to the nutrition community, one that affects the American youth and adult populations, improving human health requires better understanding of an individual’s nutrient requirements across the life cycle and nutritional value of foods, a research objective of AFRI. Broadening the scope of AFRI research is also essential to provide the critically needed evidence for the most effective nutrition policy and decision making to maximize the health of the US population. Further, basic research has resulted in innovation and scientific advances that improve our citizens’ lives, and ASN wishes to see the benefits of basic research in nutrition recognized in the next RFA.

Finally, if America is to maintain the most nutritious, most affordable, and safest food supply in the world, future funding levels need to be increased, lest underfunding undermine the success of this valuable program. The breadth and competitive nature of research funded through NIFA should be maintained and expanded to ensure this critical investigator-initiated research continues to improve the health of all Americans. ASN supports restoring the foundational programs in FY 2011 at no less than 20% of the AFRI budget and strongly supports increased funding for AFRI at a level of \$500 million for FY 2011.

In sum, ASN advocates for a balanced research portfolio for AFRI in terms of principal investigator- initiated vs. collaborative research grants and in terms of basic vs. applied research grants over a spectrum of nutrition-related diseases. An AFRI emphasis should remain on obesity, but obesity should not become the sole target for AFRI’s nutrition research funding. We hope these comments are useful as the department looks ahead to the FY 2011 AFRI Program Solicitations. Please do not hesitate to contact John Courtney, ASN Executive Officer, by phone at (301) 634-7050 or by email at [jcourtney@nutrition.org](mailto:jcourtney@nutrition.org) should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert M. Russell". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Robert M. Russell, MD  
President