

Workbooks and Survey

- “Organic” certification of CAFOs and hydroponics must end, no matter where it occurs. The other variables can be managed, as they have been for 20+ years.
- “Organic” will become meaningless unless the USDA stops the “organic” certification of soilless systems and CAFOs. No other country allows soilless hydroponic systems to be certified “organic,” yet crops grown in foreign countries are being sold as “organic” to US consumers, when those crops could not be sold as “organic” in their countries of origin.
- No additional label claims, just enforce the existing standards
- Let small producers of organic do these kinds of actions like certification/marketing classifications because they know what is needed not the government 2000 miles away in some windowless office
- Including additional Claims to the Organic Seal might be difficult to implement without causing confusion for the consumer and/or increase the current challenge of having too many claims in the market. Maybe the USDA Organic Seal could be heightened by devoting marketing resources to enhance consumer awareness of everything that is “included” in the Organic seal (e.g. non-GMO, etc.).
- Using environmental challenges as the baseline, the other elements naturally fall into place.
- Climate change, now more fully recognized, is a current mantra that provides an opportunity to champion the benefits organic production brings to the equation. The powers that be, inside and outside of national organic program, can, and should, do more to influence policy in that regard and should be more fully engaged to champion organic production as a short and long-term solution. The devastating impact of high input costs and detrimental effects of our current mode of operation needs greater exposure. Agencies within the organic sector are aware of this fallacy and could do much more to promote a positive shift in this paradigm.
- Non-GMO and all that it implies, including new processes such as gene editing, must continue to be the status quo and should be championed as a benefit. Climate friendly? Absolutely! Those resonate with consumers. A ‘road to food security’ should be considered as well.
- Absolutely yes!! organic regulations should incorporate and adapt to emerging environmental challenges
- Say what you mean and do it. there is control by corporations on decisions that foster non organic use of materials. CAFO dairy is but one area. The non soil growing of foods and labeled as organic
- Focus on the integrity of the current seal and program behind it. once that is solid, USDA might be trusted to delve into the other areas. in the meantime, expect others to keep trying modernize.
- I think that some labels might be a good match for Organic; for example, I am especially fond of the Fair Trade USA; combined with Organic, we believe it provides a very strong combination of caring for the environment and caring for people. Another certification that has gained a lot of traction is “B Corp”.
- While standards need updating, it could be very frustrating for some organically certified producers to be decertified.

- Organic standards should include better options for farmworkers - alternatives to H2A that have path to citizenship
- Could USDA set a minimum wage for all agricultural workers? That would help with equity and put farmers on a more even foundation
- Nutrition is important. Not sure how the standards could address it. Research through other programs might be a better way than to have something in organic standards.
- I do not think Organic needs a specific set of Labor standards, that is different from non-Organic
- Having organic standards address the nutritional content of foods would be a good aspiration, but we already know enough to know that striving for organic takes us to a more nutrient-rich and contaminant-poor system, so I don't hope to waste tons of resources on labeling while losing site of the forest for the trees.
- Organic is nutrient dense and meets and exceeds the standards usually. This question shows just how foolish these questions are to those who know organic
- What if organic certification was designed as a point system (like B Corps)? Maybe you use renewable energy, pasture-raised, GHG emissions etc (coupled with consumer education). Then consumers could shop by points. (like wine) (like hotel industry ratings)
- Numerous claims already exist, stemming from disillusion with adequate enforcement of the existing standards. The fear in this process is that it creates, at least some level of consumer confusion and may erode the overall confidence in the USDA Seal. This, I believe is the downside and the more add-on labels that emerge the more it becomes an issue. Let's just get back to the basics and assure that the Seal remains the Gold Standard and that practices that erode its reputation be addressed and corrected.
- Changing standards (a weakening of standards - ie: hydroponics are allowed) makes the landscape confusing for consumers. The integrity is lost a bit.
- Some consumers view organic as "bougie."
- Some consumers barely know what organic means - USDA should spend more money on helping market organic.
- Hydroponic is a huge detriment to the integrity of the seal and consumer perception.
- Integrity of organic label and misuse of organic label on market. Imported grains may disincentivize transitioning here in the US and drives down prices. How to share grievances or concerns without causing the organic label/movement to be suspect.
- Logo needs a refresh and needs a cool tagline!
- The NOP and what the seal stands for is feeling diluted - there are now "real" and "regenerative" labels and that weakens the organic label - even though those are essentially designed to be add-ons to the organic program.
- If only we could have a health-savings account - gold stars for eating organic!
- Lots of discussion about organic being watered down, not useful for small producers selling direct. Only useful for those same small-mid sized farmers selling retail.
- Long discussion of the Real Organic Certification driven innovation, but not delivering on the marketing front.
- Changing the label would only confuse the consumer.
- We need to empower applicants and certified operators to use technology to the maximum extent possible to streamline the certification and re-certification process, with

something like “cell phone certification” and recordkeeping systems. Certifiers must capture more data, such as projected yield and sales amounts, in organic system plans, which will facilitate inspectors and certifiers to conduct reliable, random mass balance audits. In addition, lot-specific electronic transaction certificates should be generated by certifiers and tracked in real time to minimize fraud.

- In regards to organizations and universities improving environmental outcomes. The Universities are controlled by corporations on funding, I do not trust the land grants due to them being 20 years behind on serving producers needs
- I just do not trust this developing action based on who is doing the development to serve corporate needs not small producers needs
- Through our participation with OFARM, we have had the opportunity several times to hear directly from David Glasgow at NOP. He has brought to our attention the opportunities to give our comments to the NOSB and to give our voice to various current issues. We receive updates from the Organic Insider. More farmers should participate in these opportunities.
- Now that NOP has an expanded staff, perhaps they could sponsor more trainings with certifiers.
- The NOP must use the accreditation system to enforce the Organic Foods Production Act (OFPA). The NOP must also respect and implement NOSB Recommendations. The NOSB Principles of Organic Production and Handling, adopted unanimously in 2001, require that organic crops be grown using soil building practices. OFPA section 6513(b)(1) requires that organic system plans for crop farms describe the farm’s soil building practices. The NOP Final Rule requires soil building practices and soil building crop rotations. The definition of “organic production” requires that organic farmers recycle resources, “promote ecological balance and conserve biodiversity.” These provisions are being ignored by the NOP and a handful of renegade certification agencies who certify soilless hydroponic systems as “organic.” Soilless hydroponic container growing systems do not build soil, sequester carbon, conserve biodiversity or promote ecological balance. They are industrial facilities that use vast amounts of inputs and energy. By allowing such systems to be certified “organic” and carry the USDA Organic logo, the USDA is undermining the integrity of all things organic. USDA must follow the 2010 NOSB recommendation and enforce OFPA by using the accreditation process to force certification agencies to implement the law and rule, as written, and stop the certification of soilless crop production systems, if organic is to have any credible place in climate smart agricultural discussions, strategies and investments.
- There are historic conflicts between organic requirements and Federal crop insurance programs. Some have been resolved, but others remain, particularly around insurance coverage for cover crops, green manure crops, and perennial crops. The Organic Research and Extension Initiative and NRCS Organic Initiative require soil building practices to participate in their programs, but the NOP no longer requires that “organic” crops be grown in soil! That is a fundamental conflict that can only be resolved by the NOP using the accreditation process to end the “organic” certification of soilless production systems.

- USDA to develop FREE record keeping app for farmers that feeds into certifiers system and OSP/application (HUGE time saver for everyone). Now that would be an enormous and strategic support to the industry
- Regarding appointments to the NOSB, four seats are reserved for organic farmers. At times, those seats have been filled by non-farmers, or by employees of large, corporate farms. The USDA must establish criteria to make sure that only active, certified organic farmers are appointed to the farmer seats on the NOSB. In the application process, the USDA should require that applicants submit copies their organic crop, wild crop or livestock certificates. They should also provide proof that they file Schedule F with the IRS. If applicable, they should submit their farms' FSA number and/or evidence that they participate in NRCS conservation programs.
- There needs to be more transparent and rapid response from NOP to NOSB, and complete explanation of basis on which some NOSB recommendations are rejected or ignored. that fact that this has not consistently occurred shows that farmers voices are not adequately represented.
- Should be about local decisions on national standards by local organic operators. corporations should not be allowed to participate
- It would help farmers to navigate the resources if there were more networking between farmer groups and the USDA agencies. Organizing events with USDA staff as speakers would be valuable. Mentoring programs, farmer to farmer, are also opportunities to share information.
- There is currently a wealth of information available, both within and outside of the national organic program. The obligation of the USDA is and should remain the watchdog to assure that all the connections are playing by the same rules. Obviously, huge shortfalls have and continue to exist but improvements, slow as they may be in forthcoming will help in that regard.
- As long as USDA views Organic merely as a marketing niche, and not as the foundation of fundamentally healthy tools to improve soil-, livestock-, and public health, and to improve climate resilience, carbon storage, and other aspects of functional ecosystems, there will be ongoing conflicts.
- Appoint a Secretary of Agriculture who has deep knowledge and respect for the past and present role of agroecological systems in "feeding the world" would be one good place to start.
- Resources can be better organized at the USDA, They do not do this well , many do not have internet ability
- It seems counter-intuitive that a system set up so that NOSB recommendations be considered by NOP/USDA to develop regulations, have such a massive backlog (as set forth in Appendix 2). Perhaps, a limit of time should be implemented (e.g. 3-5 years) for NOP to either consider an NOSB recommendation or reject it based on specific grounds/concerns, etc. ??
- Increased availability by making Organic food to be more available through nutrition programs.

- USDA should absolutely provide support to organic farmers!! I think that crop insurance or, even better, revenue insurance would alleviate the farmers' main concerns/challenges.
- As a certified organic fruit farmer, it is very difficult to navigate FSA programs, which are geared to support conventional commodity producers. FSA program offerings vary from state to state, and even from county to county and depend on the orientation of local staff and county committees. Organic and socially disadvantaged producers do not receive warm welcomes or much support in many county FSA offices. Since the FSA administers Federal programs, this must change. All Federal employees who engage with organic programs, including staff of the NOP, FSA, NIFA, and NRCS, must be trained on OFPA, the Final Rule, and the NOSB Principles of Organic Production and Handling.
- There is a lifetime of complex literature addressing the tools and consequences of agroecological systems. This will require paradigm shifts beyond the current habits exhibited by USDA leadership, but I also welcome change, even from people we least expect to change. We are truly all in this together.
- ALL USDA personnel could benefit from education re organic principles.
- Networking to share what is available through state departments of agriculture and the FLAG organization.
- Organic regulations often take years ahead to adapt production
- All the great achievements accomplished thus far in the development of a viable organic industry, from initiation of the OFPA, to development of standards, the growing of the industry, the continuing development of surveillance, etc. etc. have come about by people discussing, cooperating, collaborating, and coming to logical and meaningful consensus for a path forward. The ongoing involvement and participation in this process is fundamental to the future of organic agriculture. It precludes that to continue this process, not just as individuals, but collectively as organizations that come to the table with creative solutions to the issues that will continue to arise. When we continue those efforts with respect for each other's opinions while we find common ground, we will continue to increase our viability. Without this attitude of cooperation and collaboration we will be doomed to failure to the detriment of a viable and secure future of food production system.
- The OFPA and the standards that were developed were and remain a sound base for the operation of an organic production and marketing system. God forbid that we would open the OFPA for a re-write, with the opportunity to allow the economically powerful to exert their influence. As disillusioned as we may be with the process to oversee and amend it, as may be needed, it is still better than a complete overhaul.
- The USDA must first enforce the law and regulations using the accreditation system.
- The NOP should establish a hotline or quick response system, so that certifiers can get their questions answered in a timely, professional and consistent manner.
- Many accredited certifiers do not accept applications from soilless hydroponic container growers, because such operations do not fit any of the scopes (crops, wild crops, livestock, and handling) for organic certification. A few certifiers do accept and approve such operations, however, which leads to inconsistent enforcement of OFPA.

- NOP must use its accreditation program to bring all certifiers into compliance with OFPA and the Final Rule.
- Most accredited certifiers do not approve continuous confinement livestock systems, but a few certifiers do approve “organic” Concentrated Animal Feeding Operations (CAFOs). Consumer confidence is being eroded by inconsistent interpretations and organic farmers are suffering from unfair competition. This must end, and the NOP has the power to do so, without any new rules being promulgated.
- Risk assessment must be used by USDA in the accreditation system. All OFPA requirements must be audited, along with all the requirements of the Final Rule. This is not currently being done. High risk certifiers must be identified and targeted. These include certifiers known to certify non-compliant operations and systems of production, along with certifiers that submit incomplete and/or inconsistent information in their annual updates.
- The current OSP is adequate in my opinion.
- The OSP can serve. It requires tracking from land/seed, etc. to the sale. I believe each sale should have a transaction certificate to avoid fraud, especially for grain & forage crops.
- Organic System Plans are an essential component of the organic certification process. In completing an OSP, a certification applicant is required to put in writing all of the crops and/or products requested for certification; all practices and inputs that will be used; describe the operation’s soil building practices and crop rotations; list all production sites and field histories; describe steps taken to protect organic integrity, prevent commingling and contamination; recordkeeping system; and label claims. No crop operation should be certified, unless it complies with this fundamental OFPA requirement. OSPs can be strengthened by requiring all certification agencies to capture and track better data on projected yields and sales, so that mass balance audits can be consistently conducted and fraud deterred or exposed and prosecuted. Further, OSP updates should be simple, seamless and secure. Redundancy of information requested should be eliminated, with a focus on any changes made by the operation which may impact organic certification.
- The organic system plan is clearly far too over the top for small operators
- The OSP is essential. Only there can the intent of the operation be evaluated to buy into the concepts and evaluate the intent to follow the basic rules that govern the industry.
- With fraud, it is appreciated that much has been accomplished already. Several processes have been initiated that are working but resources are still inadequate considering the size and complexity of the issue. With the increase in NOP staff and USDA agencies working more closely, it should improve the process to prevent fraud.
- Much has already been done to develop the interagency cooperation in dealing with fraud issue. More should be done in cross training about the process needed to detect irregularities and halt the flow when irregularities become suspect and investigation can be initiated.
- The larger problem we have been facing is the fair equitable enforcement of the rules in place across the broad scope of size in the operations.
- It would be useful for the NOP and certifiers to look into the procedures adopted by ABET (formerly the American Board of Engineering and Technology) that oversees the

accreditation of Engineering departments in universities all over the U.S. and beyond.. they have set up protocols for achieving consistency among different certification teams who go to diff't universities, and some of this may be instructive the organic community. It would good for farmers, consumers, certifiers and the entire reputation of the Organic Label if there was more clarity on this issue.

- Consider blockchain technology for some products of certification to modernize it
- Whatever refinements are made in certification will not be particularly valuable if they are not part of big-picture effort to harmonize efforts among nations and among certifiers. Perhaps a tiered system may be appropriate depending on scale of farms so as to avoid penalizing any farmers and ranchers for being small.
- Crop farms that rely on input substitution rather than soil building crop rotations, as required by NOP 205.205, must be targeted as high-risk operations, along with split operations and those with parallel production.
- Foreign operations that do not comply with their own domestic organic requirements, yet attempt to be certified to the NOP in order to sell their product as “organic” in the USA, must be seen as high risk.
- CAFOs that don't have sufficient land to graze their ruminant livestock must be targeted as high risk, which means additional inspections and additional recordkeeping and reporting requirements.
- Inspectors must conduct mass balance audits during all inspections, especially focused on high risk operations. Such high risk operations must also be targeted for unannounced inspections and sample collections for residue analysis. On the other hand, operations that have received no non-compliances for 3 consecutive years should be seen as low risk. They must still be inspected annually, however. Inspectors and certifiers must understand that they are involved in the enforcement of a Federal law and must employ investigative tools, including risk assessment.
- To deter fraud, all wholesale sales of organic products must be accompanied by a certifier-issued, lot-specific Certificate of Authenticity or Transaction Certificate. The NOP's Organic Integrity Database could be used to facilitate the issuance and tracking of such transaction certificates, so that the system is implemented universally and uniformly.
- Certifiers and inspectors need better tools to “track the numbers” to assure that the quantities of products sold as “organic” match the amount of land or animals certified to produce such products or, for handlers, that the amounts of organic ingredients purchased matches the quantities of finished products sold as “organic.”
- I know places where CA certifiers never show up and allow non organic actions When reported the eye is closed to correcting the actions of the illegal operation.
- Risk assessment, Inspections and checks for illegal used materials in the production system
- We need fewer certifiers that are well paid and well trained
- When I get told NOP will be increasing inspecting, not enough inspectors are hired. The man from the USDA and NOP leaves to join the corporate world the next week.
- Size and complexity are the primary key factors. Certification review time should grow as either of these factors grow.

- One issue that needs to be addressed is that the certification process is nearly totally self-funded by the entities being certified. Money talks! It also exerts considerable influence when questionable process is evaluated. I realize that an alternative will not be easy process but a system of providing funding for certification as a matter of process it would largely eliminate the issue of self-funding influencing the outcomes of the certification process. To much of the self-certification exists on many fronts and is a detriment to the current mode of operation for the organic industry. This change would allow for pre-inspection of the OSP process instead of relegating it to an 'after the fact' process of surveillance.
- For fraud, an open database that may be consulted by all interested parties (e.g. to view/print Organic Certificates for a specific grower). My recollection is that this topic is, at least, addressed in the S.O.E. and subsequent O.T.A.'s comments.
- Why hasn't USDA NOP developed a FREE app for farmers to use for recordkeeping and automatic OSP filling? It could link directly to Certifiers systems. This would save everyone time and \$ and would streamline the process. Paper version still available obviously for anyone who needs it.
- With the expanded staff at NOP and the once the SOE is in place, the enforcement of standards should improve.
- have enforcement be prompt, not months or years later . If caught you are restricted and maybe banned is an action that is needed
- When caught breaking organic regulations, jail or banned and those who did the deeds held accountable verse the corporation taking the blame.
- I appreciate the work that has been done recently to improve fraudulent import situation. work most needed is to protect the integrity of USDA Organic, and that puts us all in a better position to call out fraud, both domestic and foreign.
- Would make a lot of sense to have the certifier administer cost-share - More of a burden on smaller operations -
- One Idaho producer reported still not having received cost-share payment for 2021, despite Idaho's allotted funding not being spent out.
- FSA still failed with roll out in much of the country - Increasing back up to 75% would be great
- Our cost-share reimbursement has always been and remains to be available through the MN Department of Agriculture. It has always been efficient. If possible organic certification fees should be less, or at least not increased if NOP would cover cost of the audits for certification agencies. It is my understanding that these audits are still paid for by the certifiers.
- It was not always at 75% / per scope, I think that 50% / scope is adequate. I see no problem with the reduction from 75 to 50 % this past year. When we started in 1998 there was no such program. There are other programs through NRCS and FSA that are available to organic and transitioning farmers. These programs were not available either when we started. It isn't about money, it is about believing in organic is better for family, community, and environment.
- Cost share payments should go directly to certification agencies rather than relying on the FSA or State Departments of Agriculture to notify potential applicants. Many certified

operators currently do not know that they are eligible and don't receive cost share benefits. By providing support directly to certification agencies, several levels of bureaucracy will be eliminated; red tape will be reduced for producers; and more producers will receive benefits from the program. Such a program should cost much less to administer, while improving outcomes.

- Organic certification should be free for operations with organic sales of \$250,000/year or less. Above that figure, 75% is an appropriate cost share percentage, but the upper dollar limit may need to be increased from \$750 to \$1000/certificate.
- Not an easy task but a program of cost share to certifiers would help to alleviate the influence that the certification fees play into the outcome of certification approval.
- Yes organic producers should continue to get subsidized for organic certification.
- The cost is beyond the ability to pay by small operators
- Transition labels are probably too complicated to turn it into another labeling bureaucracy.
- Where did the "Arbitrary" 3-yr transition period come from? What science is that based on? Not all inputs are the same. What about using soil testing instead?
- Biggest barrier to transitioning is paperwork - doing it while listening to this discussion. Using TEND is helpful, but still time consuming. Has institutional position and biggest barrier for her to having her own farm is access to land for her personally
- \$1200-\$1300 a year to certify 10 acres with a very straight forward management plan. Seems excessive.
- Along with certification cost share providing funds for mentoring programs would be a big help.
- Organizations that offer mentoring programs could be more adequately funded to provide remuneration to mentors and mentees.
- Support checks and subsidies for farmers in transition - these are climate smart practices (didn't USDA just put out \$1 Billion dollars for projects that incentivise climate smart practices and develop a market for those products? That is what organic is and does!
- There are additional funding pools for organic and transitioning farmers for some grants, research, EQIP funding buckets - all of these opportunities in one spot and all of these funded at higher levels would be a big support.
- The cost for new and beginning farmers that don't come from a farming background to start their own operations is prohibitive
- It's expensive to be certified at a small acreage level.
- The lack of a consistent and stable pricing structure that provides assurance for active and transitioning organic producers to expect and maintain profitability to cover not only production and infrastructure costs but also consider environmental benefits, ecosystem services, community support and transfer to a next generation of organic producers.
- Nonorganic markets have failed, evidence by the continuing exodus of human element on our farms and rural communities. When the plant, spray and harvest operational paradigm garners profit non organic producers stay the course, even though they may have concerns about its impact. Unless and until the organic alternative provides for stability in the marketing sector with promise and practice of a sound economic outcome

serious consideration of transition to organic will remain sporadic at best. Marketing relationship training could be a program.

- No, the USDA should not establish a transitional certification program.
- No concerns about USDA encouraging more farmers to transition to organic farming.
- Getting into organic without straining markets by Emphasize quality grain production and cooperative marketing
- Farmer networks, cooperatives, facilities to move grain are biggest limitations to transition to organic.
- In regards to barriers preventing farmers from transitioning. if you build it they will come In our state we have seen a three fold increase in producers of organic with no gov help
- The minuscule percentage of our land currently devoted to organic production leaves an abundance of room for expansion. Embracing the need to expand organic production is at a point of needing a paradigm shift to truly consider food security.
- A robust program of mentoring where mentors and mentees can be remunerated for the time required. The value of mentoring has been clearly established in that, the process is region and situation specific in most cases. No one understands the needs better than someone who has experienced the transition process. Development of entities in a cooperative format can enhance the mentoring process and should be encouraged and supported with funding to relieve the financial burden when producers are inclined to work together to address common issues.
- There is a fear that developing a transitional label will be a step toward use of transitional grains when the certified product is in short supply. The large entities would likely give the greatest support for such a proposal and would stand to reap the greatest benefit. There is a non-GMO market which should and could suffice.
- Ongoing and increasing consumer demand leaves much room for expansion. When The supply and demand concept reaches a near balance, price pressure can only be mitigated by producers exercising inventory management through cooperative marketing initiatives.
- The needed dedication to organic in principle as better way and the mental paradigm shift needed to make the transition commitment. Most of all the prospect of economic stability once the commitment to principle and the shift in work load has been addressed. While some have committed and been successful in larger scale organic production, for the most part it needs to become a paradigm shift to farm better, not bigger. that is a basic concept that begins the process of building a better community.
- As an Organic grower, I think the main challenge is how to manage the fact that costs will be higher during the 3 years of Organic Transition, whilst revenues will be the same. Furthermore, what kind of support could the grower have if, for example, there were reduced yields for a number of months/years after beginning the transition?? I think this factor is considerably larger than costs due to certification fees, etc. Could there be subsidized Revenue Insurance??
- Implement Revenue Insurance, to alleviate the cost/risk of farmers that want to begin an Organic Transition, but are concerned about increased costs and potential loss of yields!!

- I think the main barrier is managing the risk associated to the change to Organic; it is a known fact that costs will increase without added revenue for 3 years; and, there is uncertainty about whether the crop will have yield drops, etc.
- I think that a Transitional Label would definitely help farmers during the transition.
- New markets will continue to emerge, and existing markets will continue to change in size and scope. Surveillance will continue to be a key element.
- More mentoring and farmer cooperative education opportunities will help to connect farmers and buyers.
- No need for USDA programs to help facilitate marketing.
- A robust program of mentoring where mentors and mentees can be remunerated for the time required. The value of mentoring has been clearly established in that, the process is region and situation specific in most cases. No one understands the needs better than someone who has experienced the transition process. Development of entities in a cooperative format can enhance the mentoring process and should be encouraged and supported with funding to relieve the financial burden when producers are inclined to work together to address common issues.
- Organic Farmers cannot fully “protect themselves” as long as the Center-of-Gravity of USDA and industrial ag is undermine them.
- Continuous improvements to the supply chain are important to the overall goals of organic.
- Opportunities for farmers to work with researchers gathering data and then sharing information with other farmers through a farmer network.
- Research results shared with the farming community through networking and mentoring.
- Transportation is a big issue. More research and opportunities to share all available research results with organic and nonorganic farmers through community networks would be valuable.
- Quality workforce is also an important issue. Suggest cooperative education to include staff training and farmer groups working together with outreach to the nonorganic farming community. Marketing relationship training could be a program.
- Increase in the human element on our farms and rural communities will help to address the challenges.
- Increased visibility of Organic vs. Conventional, whenever reporting about Pricing, volumes of imported produce, etc.
- Weather has been more challenging with climate change, past growing season was dry.
- Those without preexisting privilege that enables them to self-subsidize their farms are hardest hit by the barriers.....so that means that people of color or who live in otherwise challenged environments have the toughest hill to climb, but this should never be used as a divisive fact, because indeed our entire population is hurt by these inequities.
- I’m also concerned about social justice issues (labor and land) and that is complicated by the fact that so many farmers of color aren’t able to be part of the organic movement because of historical loss of land - heavily influenced by lack of loan assistance from USDA.
- I believe opportunities are available to all, not one group having an extra advantage over another.

- Could there be a coop advertisement - templates from the USDA. "Insert farm name here" on posters, signs, etc. Conventional farms are paid to not grow some crops for price control - this may show that money is available for promotional programs.
- Could there be USDA US product label to help ensure market integrity for US organic farmers without getting undercut by the global market.
- Simply put, a fair stable pricing structure to assure economic viability. The commoditized marketing structure of non-organic agriculture has failed us miserably.
- Access to land is primarily due to cost. Need more education opportunities-farmer network sessions and mentoring. Introduction and participation in farmer cooperative marketing with experience with pricing and transportation.
- More education session with USDA cooperating with farmer networks.
- Organizations with a focus on education and research co-sponsor opportunities with USDA agencies to provide support for current organic farmers and those in transition.
- Stay out with your regulations and ways to do business. No desire for facilitation of connections between farmers and buyers
- Simply put, a fair stable pricing structure to assure economic viability will ensure farm succession. The commoditized marketing structure of non-organic agriculture has failed us miserably.
- Access to agronomical know-how, access to inputs at competitive prices, access to crop insurance (ideally, revenue insurance).
- Small farms need land access as well as credit and grant access, educational and technical assistance resources for the practices and for certification application, social network or peers, market development and business planning and market access
- Promoting the basic concept of extending the organic producer collaborations that exist in the production side of the organic industry to the marketing side where the market can be based on relationship marketing as opposed to individualistic attitude of what is in it for me. It is impossible to legislate or regulate that concept. If producers remain unwilling to approach the organic market as the rugged individuals they have been trained to become, their marketing efforts will be overshadowed by the influence of the corporate giants who are making inroads for the profit opportunities for their companies and their shareholders. Promoting cooperative marketing among producers is the key.
- Lack of certified organic livestock processors in certain regions limits farmers choosing to certify livestock. not worth it to drive 3 hours one way.
- Need USDA - price incentives for domestic organic production
- Strengthen farmer cooperatives to market alternative crops beyond corn and soybeans.
- Make crop insurance more available for diversification of minor crops, like buckwheat.
- Producers, along with the entire chain of turning farm gate products into food for consumers need to embrace and become contractable to provide for a marketing platform that provides for long term stable pricing.
- The USDA should stay out of the developing markets as your screwing these local producers effort to make markets
- USDA is 25 years too late to help , organic has done it by themselves. USDA cannot help organic market development

- Look at the grocery stores, every product is offering an organic. That was not gov developed so stay out of this effort to create markets.
- Local and regional marketing initiatives are excellent opportunities in some areas but the bulk of food inputs are distanced from the final consumer market and transportation efficiency is a key factor. Aligning production areas with consuming areas with processing along the way needs much attention and consideration. Regional opportunities need greater consideration. The current system still continues to shift away from this common-sense consideration. Organic production and marketing at least move in the right direction.
- Promoting the basic concept of extending the organic producer collaborations that exist in the production side of the organic industry to the marketing side where the market can be based on relationship marketing as opposed to individualistic attitude of what is in it for me. It is impossible to legislate or regulate that concept. If producers remain unwilling to approach the organic market as the rugged individuals they have been trained to become their marketing efforts will be overshadowed by the influence of the corporate giants who are making inroads for the profit opportunities for their companies and their shareholders. Promoting cooperative marketing among producers is the key.
- The basic concept of cooperation for the market side of the organic is paramount. As the size and scope of the buy side of the equation becomes larger and more concentrated the decibels of the producer voice and the position at the bargaining table become more diminished. Even in the best-case scenarios where a buyer is in tune with fairness to producers a relationship with a group of producers is better than individual relationships. Where the buy side of the equation becomes enamored with the profit factor for themselves the only hope for producer fairness is in cooperation on the sell side to gain a seat and a fair representation at the bargaining table. Cooperation among producers needs to be emphasized in every marketing conversation. Lack of producers embracing this concept is what has led to the outcome of increased buyer control of the market. If the organic market fails to address this scenario, then it will be doomed to the same outcome as the non-organic market is experiencing with its ongoing volatility to the detriment of the producer's economic viability.
- Producers need to do more in providing for ownership and control of the collection, processing and distribution.
- For grain producers on farm storage is the first priority. Once the grain has passed the farm gate most of the possibilities for market control have left with it. Being able to deliver to a local elevator at harvest has been a detrimental downfall in the non-organic market with the shift to buyer control that comes with it.
- Workforce availability is a major concern for Organic farming, especially as it becomes increasingly difficult to perform manual control of weeds, pests, etc. Organic farmers need more knowledge/support/access to improved technology and/or processes to address tasks that become increasingly non-economically-viable if done manually. I am aware that this answer is really more about supply than the markets, but increased supply should account for lower costs and make Organic produce reach better Price Points to attract more consumers.

- I think that at the very core of Organic principles is the notion that Organic should be “the” standard. Hence, at some point, ideally, being Organic would not be about a Price Premium, but about being able to sell the product.
- Farmer networks / cooperatives. Are hot topics in my region (Minnesota)
- Not enough processing in my region
- Grain storage / transfer to shipping by truck or by rail are lacking in my region.
- Minor crops-barley, buckwheat, oats, pulses, rye are commodities lacking support.
- Knowledgeable, dedicated staff are labor challenges
- Is there extension support for technical assistance in your region? Better than some other areas.
- Do farmers in your region access NRCS or FSA services in regional offices or county extension? Yes.
- Do you feel NRCS and FSA office staff in your region are familiar with organic? Yes.
- Current involvement in local networks: Organic Farmers Agency for Relationship Marketing (OFARM), National Farmers Organization (NFO), Sustainable Farming Association of MN (SFA).
- Finding resources like seeds and other inputs continues to be a barrier in Kentucky
- In KY geographic location determines market access - major cities are where consumers are buying at scale.
- Many of the new organic farmers in Idaho are small acreage, and the programs in the state aren’t set up to support small acreage, let alone organic small acreage.
- Chemical farmers should be required to pay for certification to be allowed to use herbicides, pesticides, and chemical fertilizersand perhaps these needs to occur as a %tax on all non-organic foods that consumers would pay for....Organic foods should not be taxed in this way, and organic farmers should be relieved of the cost of chemical ag in this way. This would not completely alleviate the unfair burden that organic farmers and all citizens pay for damage to our land, bodies and public health, but it could be one step in a constructive direction. It could also help inspire and fund education on many fronts related to agriculture.
- The standard risk assessments in Farm Bill-designated programs such as crop insurance and assistance for things like cover crops should not inadvertently penalize farmers for organic practices...as is sometimes the case. Common and important organic practices such as crop diversity, cover cropping, inter-seeding of crops are practices that reduce risk and provide internal ‘farm insurance’ and should be rewarded, not penalized.
- The overall Farm Bill landscape does not incentivize crop diversity on our croplands or in our food processing infrastructure nationally.
- Remove the corporations in decision making. They have people they can pay to attend these meeting and small producers have little time to participate.
- Given the contractual relationships that are in place for use of prohibited products and processes more needs to be done to hold the patent holders of these products and processes responsible for consequences. Back to a basic concept of responsibility for the ownership and proper use of the product or process.

- A great thing is that there is funding for resources and there are funds for research. The competition pool for organic grower grants is separate from larger farming producer groups (helping increase access for organic farmers).
- A one size fits all solution does not exist: Sandy soil vs Heavy soil - Hard winter zones vs Subtropical / Tropical – Aqua/Hydroponic/Container vs soil based – Animal vs Nonanimal – Farming vs On-farm Processing Each operations must develop a site specific program to meet the environmental goals
- Guidance that is not prescriptive, each program must be site specific
- A loss of certification if environmental issues are not addressed in a timely manner
- Providing grants for preapproved environmental upgrades
- Many folks would advocate that you have to take a quantitative approach to measuring improvements in these areas, similar to NRCS. This may be too prescriptive and miss out on the holistic benefits that organic systems provide. Integrating more quantitative standards must be done cautiously. It could be done in conjunction with NRCS. The only fear is that this could become too prescriptive.
- Standard writing is an art that was more widely practiced in the early days of the organic community--we have been relying on the NOP to develop standards for decades now, so there are fewer people with standard writing skills and experience. It is a combo of integrating ideas from different stakeholders along with the technical writing skills to express complex ideas clearly and succinctly.
- The scope of each set of standards must be broad enough to be used under varying conditions, yet clearly articulated to be meaningful. Each of these topics will require people to roll up their sleeves, draft ideas, and collaborate with other stakeholders until there is a workable way forward. As suggested above, a starting point for these efforts might be Stakeholder Summits.
- With regard to environmental issues, many are already represented in the regulations so there is an opportunity to expand or build on their effectiveness with guidance that explains how operators may apply existing standards to greater environmental advantage. However, as explained in more detail in a similar question about the effectiveness of guidance under Continuous Improvement (Question #16), only a change to the regulations will be sufficient to underpin true change organic systems.
- When labor and social issues were discussed in the 1980's there was a consensus that we needed to make Organics a viable industry before we addressed these issues. The fact that most homes in the USA now buy some Organic products and we remain on an unprecedented growth curve, it's safe to say Organics is a viable industry. Labor and social issues need to be addressed on a sliding scale based on the size of the operation. A small farm or processor does not have the financial wherewithal to meet the changes that a large multinational company does. There is also the issues of off shore Organic products, how do domestic operations compete with product that has a lower currency and lower standards of living than the USA. This does not mean Labor and Societal issues cannot be addressed, they must take into account all of the mitigating factors but bottom line is Organics must lead the way on workplace safety, livable wages and lifting farmworkers standard of living

- Existing standards have done little for farm/manufacturing workers to date; new standards will be needed
- although extremely important, social standards are more effectively developed separately. The current NOP system is already stretched to effectively address environmental and public health impacts of agricultural production. Such standards do already exist within non-profit organizations and responsible organic operations can layer them on to NOP requirements. This is likely to give such operations a competitive advantage as consumer interest and awareness demand fair and just labor and social practices.
- Yes. If NOP doesn't embrace this and figure out a way to make it work, the National Organic Program will lose its relevancy. The extent to which these can be reasonably incorporated is questionable. We can only do so much and do it well. While organic certification (and food safety certification) provides an opportunity for site-visits, it is particularly tricky to legislate labor issues on NOP-certified farms located in other countries.
- One option is to include them as a broad stroke—such as IFOAM does in referencing labor laws. For example, if a farmer is sanctioned by a governmental agency for disregarding labor laws, they should not be able to be a responsible party to a certified operation. Similar for certification bodies.
- We are not sure what the best approach would be. This topic would be a great one to discuss through an NOP Town Hall or industry listening session. Finding the right approach is important so we achieve something that is enforceable (i.e., violators could lose their certification).
- An option could be to add language to the Farm Bill amending OFPA to state that operators must comply with the labor laws of the state/country they reside and operate in. This could function in a similar way to eligibility for Farm Bill programs being contingent upon HELC and WC.
- Label needs to be refreshed
- More colors, more life in the soil (earthworms) and air (Pollinators).
- Never GMO's, Grown with Nature & Much More on the label
- Most trust it, but are confused about Organics in general
- They are surprised that Organic offers more than the other labels
- Consumers believe there is an inference that the other claims/certification are more inclusive than Organic
- We need to sit down with the Organic consumers groups and work out a peace treaty. They hurt Organics more than any other group. There is a way to disagree without tearing down Organics.
- Consumers don't understand all that the label represents
- don't change now that there is good consumer recognition. More time promoting what organic represents – not just the requirements but the beneficial outcomes.
- Unless new claims are included in the regulation, there should be no new claims added.
- Natural, Real Organic, Grown using organic practices, No pesticides, antibiotics, growth hormones, etc. (any individual aspects of our full standard/regulation.) Regenerative (but not Regenerative Organic)

- Clear display of logo on packaging, website, social media, etc. Information about the full scope of organic and its benefits to environment and public health on website, social media and the Seal represents those benefits. Non-profit organizations inform and educate about organic seal on their websites, social media and what it represents (not just regulatory requirements). Comparison charts of different label claims/seals developed and promoted. Advertising campaigns, marketing messages, public relations outreach to influencers. Podcasts.
- Mandates and funding for NOP (or USDA) to have a promotion campaign or for grants to non-profits to do promotion.
- While we do not have the data or market research to support it, yes, we believe people do look for the label and that they do believe it indicates something positive—but maybe they don't know exactly what.
- It is possible that the negative press from competing certifications and public interest groups about ongoing problems with the NOP and organic standards that is constantly roiling in the media and social media do result in some level of uncertainty about the value of the organic label. However, it seems like the impact is still minimal.
- Given the continued demand for organic products and the strong growth of the industry, it can be assumed that the label is still resonating. However there appears to be strong support from younger consumers for Controlled Environment Agriculture and a push for sustainability. That could be a threat to the organic label, especially given that we have been completely unable to address greenhouse standards and hydroponics in a constructive manner and now these topics have been removed from the NOSB agenda.
- What we think needs to be updated and modernized are the standards behind the label and the enforcement of its claims.
- One idea for updating the label itself, would be to make the band around the outside of the circle wider and with a white center where important features of the organic standards and proven benefits of organic agriculture could be touted such as: Non-GMO, Promotes Healthy Soils, Humane Practices, Climate Smart, Pollinator Friendly, Sequesters Carbon, "Inspected," etc.
- We have not heard anything specific to the organic seal from our customers.
- There is increasing interest from our retailer customers in Fair Trade and on-farm social/labor standards.
- Not applicable however many of our produce growers have Salmon-Safe and Fair-Trade certification.
- Non-GMO seems to be the most prevalent next to organic for packaged products. Real Organic Project seems to compete in the direct-to-consumer market and Regenerative Organic Certification seems to be slowly gaining steam on packaged products. Climate friendly certifications also are expanding.
- Solutions that solve the tangles and omissions in the organic standards—especially those that would address the issues of concern to the other labels.
- We should co-opt the term "regenerative" by using it freely when touting the benefits that organic already provides in protecting the environment and mitigating climate change. That way, regenerative practices are framed as a subset of organic instead of a shiny new thing.

- Certified operations can do a better job of marketing organic . OTA could provide marketing support and assistance to its members with implementing these campaigns.
- judging by retail growth, label claims and promotions ,the label still resonates with consumers. Previous surveys indicate that the US organic seal is the 2nd or 3rd most recognized seal, behind Good Housekeeping and UL
- Changing the USDA organic seal would be a disaster. However, rules could be relaxed regarding PMS colors
- Verifiable claims should be allowed on the package/label but not added to the USDA seal. Industry and Government should invest in consumer resonating Tag Lines. Organic, Before Organic Was Cool, From Farm to Table, Consumers Trust the organic Label
- More misunderstanding than clarity – Most seeking USDA or NSF certified organic over other labels like “Real Organic”.
- IN practice companies apply for USDA only and or USDA/COR, then, in this order, EU, Swiss, Japan, Korea Taiwan. UK will be also move rapidly up the value chains
- NON GMO, NON GMO, NON GMO Test Tube Proteins are threats to organic.
- The US needs promotion programs and production incentives similar to the EU CAP/Green Deal and Farm to Fork strategies + incentivized taxonomies. EU is investing \$450M on domestic organic promotion while OTA gets about \$1M for international promotions
- Organics is in its infancy, there will be more discoveries and new procedures for farming, cooling, sanitizing, manufacturing and retailing. We must keep up with changes in technology and consumer demands
- Use of Ag satellites to determine if prohibited substances have been used on a farm prior to harvest. Lab testing of finished product will not show the use of synthetic fertilizer, preemergent herbicides or early crop pesticides.
- Virtual inspections don't work
- Standardize forms and digital systems
- Lack of Standardization
- Photos & videos can provide objective evidence, tablets that bring the forms into the field are super helpful and can reduce the time needed to write the inspection report.
- Portable printers are great for gathering operator's signatures of OSP changes, exit interviews, etc.
- Satellite Wi-Fi or personal hotspots since many inspectors link directly to certifier's databases during inspection and failing to get internet service causes delays, which certified operators must pay for since inspectors bill by the hour.
- Other tools might include drones, rapid test for common pesticide presence, and a toolkit for onsite assessment of soil and water quality.
- Virtual inspections can save time and travel costs but are not a substitute for visiting an operation. CB (Certifying Bodies) may be able to utilize a risk-based approach to reduce annual inspections for operations that have consistently demonstrated continuous improvement and integrity.
- When an inspector is on site, they can see more and integrate it better.

- Virtual inspections provide more opportunities for the operator to direct the inspector to just the things the operator feels comfortable showing.
- Many positive outcomes using virtual technologies after the required, initial onsite inspection.. Also, enhancing hybrid models that include hybrid reviews based on risk assessment
- WE, Industry and Government need to be forward thinking and anticipate regional constraints and the evolution of practices and changing realities of practices, climate and global pollution in specific regions. Also, important to anticipate the repercussions of government decisions/actions in a vacuum – as so dramatically seen in the revocation of the India Recognition Agreement.
- Education & workshops help provide information on both regulations and best practices. Ad campaigns and awards and presentations that focus on operations that embrace continuous improvement would be a “carrot,” while filing complaints and avoiding working with players in the marketplace who flaunt the regulations could be a “stick”.
- Industry or scope-specific task forces convened with the goal of ‘petitioning’ for improved standards.
- Incentives for those who engage in experimentation with consideration that their efforts do not cost them certification.
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- NOP Should be expanded integration of NOSB recommendations as well as expanded role in organic trade
- NOP should focus on standard development and serving as a standard holder—NOP should not be involved in accreditation in order to achieve the level of separation of function required for compliance with ISO/IEC 17011: Conformity assessment – Requirements for accreditation bodies accrediting conformity assessment bodies (compliance is required by §205.509 of the NOP regulations).
- NOP should continue with complaint and enforcement activities.
- A gaping hole in the regulatory structure is that the NOP does not have authority over the input manufacturers and has no clear mechanism for oversight over them either—despite the serious, documented, repeated problems with fraud in the input sector. Lack over oversight of organic products when they reach the retail market is also a problem.
- Complaint and enforcement activities really need to be ramped up. For a long time, the NOP seemed to dismiss issues arising through complaints. This situation, in concert with the drawn-out process for dealing with compliance issues encouraged bad actors to continue dicey actions, leaving the trade to try private sector measures to curb fraudulent activities.
- NOP should perform regular GAP analysis of NOP standards against industry practices, new trends, and new innovative production systems. The food system is rapidly evolving and so are other standards such as food safety, yet NOP standards remain static. In essence, be more proactive with standards updates.
- NOP needs much more emphasis on standards development to keep up with industry evolution and deal with emerging issues such as climate change, social concerns, etc. Ideally, standards development needs to be strongly connected to the stakeholders, so

the first drafts are practical, clearly-written, and technically viable for crafting middle path solutions for contentious issues. For example, NOP standards writers could get out in the field to see the actual issues they are regulating. Even better, job shadowing would help them understand issues in greater depth. Getting a good start on the content of standard development/revision would help move the subsequent steps of the regulatory process along in a reasonable timeframe and with more support from the stakeholders. Doing everything behind closed doors and then dropping a proposed or final regulation on the organic stakeholders is just not a great way to proceed—especially considering that organic is a voluntary program.

- Lack of a conduit for communication between NOP and organic stakeholders is one of the most frustrating aspects of working with the government. Without a formal process for communication between NOP and stakeholders, it mostly happens negatively and/or reactively. Additionally, entities that can afford lobbyists can pay to play, but others do not have access only to react and complain after the fact.
- Instead, we could have proactive NOP Listening Sessions with an agenda set ahead of time to focus on one topic that would benefit from deeper discussion, problem solving or consensus (i.e., hydroponics, non-processing handling standards, livestock issues, transition). In addition, a separate mechanism for stakeholders to bring issues to USDA, such as an open Town Hall session, would foster communication on a broader scope of topics. All Listening Sessions and Town Halls should be conducted virtually for access by the widest possible audience.
- The rulemaking process must balance due process and flexibility. The process needs to be less formal at the beginning, using systems such Listening Sessions to get ideas from stakeholders and get more formalized as the concepts become more crystalized. See more detail in Question 6: “Is NOP using its staff and resources effectively? What should the NOP focus on?”
- We’d like to see NOP establish a system for the organic community to develop standards and submit them to NOP. How about a “electronic mail slot” for submitting standards or developed regulatory concepts? This could help NOP prioritize issues that are at least partially developed and get a jump start on their work on developing standards in other areas.
- Just for the fun of it, how about NOP establishing an annual award for the set of standards or regulatory concepts that does the most to break up the backlog or create forward movement on a tough issue—like a “Organic Nobel Prize for Creative Organic Problem Solving?”
- On the non-governmental side, we suggest having Stakeholder Summits to hash out the concepts and work toward consensus in an environment that is more flexible and allows for quicker iterations than anything remotely related to the government. In the ‘old days’ we used to work more cooperatively with state governments—the organic stakeholders developed the regulatory concepts, and a lawyer would turn that into regulatory or legal language. Then the stakeholders would work together to try to get it implemented.
- Now that we know how to work together virtually, Stakeholder Summits would be more possible than ever. The electronic mode would support inclusion in ways that big meetings are unable to offer—not everyone can afford the time and money to travel to

participate and some folks are disadvantaged by long distances to popular meeting sites (like DC).

- Members of the organic trade should have easy access for submission of new standards or concepts. Having to submit suggestions through NOSB written and oral comments is only effective if one or more of the NOSB members consider a concept as viable and is willing to champion it during SC and Board meetings. Certified businesses know best what changes would be helpful, based on challenges they face at the ground-level.
- Require NOP to develop standards for “Non-Processing handling activities.” Section 205.270 as currently written is not sufficient to cover the handling activities of all certified operations and the uncertified handlers who will need to become certified as a result of SOE.
- Clarify the sunset process to put to rest the continuing calls to go back to the prior system for implementing the Sunset Review Process.
- Add a provision to the Farm Bill that requires the NOP to host at least one Listening Session or Townhall each year.
- Materials Review is probably one of the weakest areas of certification.
 - OMRI is a major resource, but it functions outside of the NOP’s jurisdiction.
 - Manufacturers of new products bring them to OMRI, which is faced with making decisions on them even when NOP regulations are unclear (ex. ammonia extract and other “unresolvable” materials).
 - Materials can be in use for years until NOSB makes a recommendation and then, because there is economic impact related to their discontinuance, finalizing into regulation is difficult, contentious, or impossible.
 - Individual certifiers vary greatly in their ability to review materials that are not on the major MRO’s lists, although such review is needed especially for regional materials and international materials.
 - It is unclear to me how material review is done by internationally-based certifiers that certify to NOP requirements—how do they keep up with the knowledge base needed?
 - Yes. We would like to see a new section of the NOP regulations containing standards for materials review. This would be the first step in establishing a system for accreditation of MRO activities. We would not recommend proceeding with a requirement for accreditation of MROs without such a regulation to govern it.
- OMRI is the outlier in that it is an MRO that is not part of a certification agency. OMRI is accredited to ISO 17065 and the NOP standards, but not by the NOP. This is a step in the right direction.
- Other MROs are also ACAs, so theoretically, their MRO activities are already subject to accreditation activities. Assessing a materials review system is a complex job that requires specialized knowledge. It can only be done sufficiently if the accreditation process allows sufficient time and expertise as part of its accreditation procedures, which has not been the case. This is a failure of the accreditation system that has not been addressed because the NOP accreditation system is not subject to continuous oversight by a third party.

- The issue is USDA Sr management, they chose to ignore Organics as a way to harm Organics. Maybe a direct oversight congressional committee to hold them responsible now and in the future.
- The NOP is to Promote and Protect Organics
- NOP Staff is not the problem, Sr USDA management is the obstacle
- NOP reviews each certification organization, continuous improvement must be one of the main objectives of NOP review.
- The role and future of the NOP is regulated – enforce the regulations, accredit certification agents, negotiate equivalency agreements (with other agencies), coordinate with other agencies to enforce, regulate, and coordinate use of the organic label. As stated above, partner with NOSB to advance and protect the organic sector. Also, NOP should be more decisive in interpretation of the regulations and provide clear answers to questions.
- In the future I would like to see the NOP have an inspector training and accreditation program. In fact, I would like inspectors to be employed and evaluated regularly by NOP, not the certification agencies. This would improve consistency in inspections, remove competition among certifiers for inspectors, remove any conflicts of interest that arise from inspectors employed by certification agents. USDA has many divisions that have inspectors, why not NOP?
- can't evaluate NOP's use of staff and resources – I'm not there to observe. NOP should focus on their responsibilities to enforce the regulations, accredit certification agents, negotiate equivalency agreements (with other agencies), coordinate with other agencies to enforce, regulate, and coordinate use of the organic label. (as stated above.
- Update frequently asked questions and answers (or start a new page: recently asked questions and answers.) More webinars from NOP to report on what they are working on, priorities, status of pending regulations, etc. Maybe podcasts to discuss topics in the Organic regulation and other regulations like EPA, FDA, FSIS, Customs, etc. Use LinkedIn to provide updates. Create a page on the website that tracks progress of regulations (where are they – in OMB, OGC, NOP etc. The newsletters with announcements and reports on enforcement activities have been useful – more on additional topics.
- Businesses can set their own organic standards above what is required, Organic Valley is an example. Trade associations and other organizations can develop organic standards to propose to NOP and Congress. If these standards are not in conflict with the NOP standards or not yet included, then organizations can promulgate these standards for membership or just to encourage continuous improvement. Additional labels of course are controversial and confusing but have some merit for users to adopt these standards. IFOAM - Organics International has been developing organic standards through a democratic process for 50 years – now these standards (or new ones) can be used as templates for those creating standards for their business, organization, or government.
- Continuous improvement doesn't depend on standards, if educational and training programs are developed to improve practices and understanding of organic principles, then standards can follow. It's about systems thinking, not additional standards. Regenerative not reductionist.

- Not only a list of NOP requirements to be checked off but actual goals set for specific areas of improvement and how to measure
- Continuous improvement starts with proactive identity and review of natural materials. However, we need to be aware of balancing the NOP Open and Closed Lists (Processing) compared to the often very closed lists in international arenas.
- Sunset materials have become too time consuming, maybe look at longer time period for materials where there is no controversy
- The NOSB was set up to bring the voice of the stakeholder community to USDA regarding materials and providing advise to the USDA NOP on the regulations. The role of the NOSB in reviewing materials is clearly identified in OFPA and the regulations. However, the advisory role is less clear and has been interpreted, in my opinion, too broadly. As advisors, the NOSB should respond to the NOP's requests, not initiate interpretations of the regulations or advance new regulations. Regardless of the fact that they are a stakeholder group, the stakeholders should be driving improvements in the regulations, not through the NOSB. Ideally if stakeholders approach NOP with questions or with proposals for regulatory changes, the NOP can either take it on internally or turn to their advisory board, the NOSB. Another pathway is for stakeholders to incorporate additions or improvements of the regulation in the course of their business – whether a company, a farm, a handler retailer, or trade association. The private sector can set its own requirements within the limitations for labeling of organic set in OFPA and NOP. As worthy as the intention for a stakeholder group is in representing those impacted by the law and regulation, it is not selected by the stakeholders in any democratic way and has evolved to be partisan and biased.
- I would not support expanding the role of the NOSB in the future. In fact, I would like to see them narrow their priorities to materials review and responding to NOP requests (as I've stated above.) If it were possible, I would like to see a more democratic process for selecting the NOSB members or improvements to the criteria for being considered. Appointments are a political process but if there were some thresholds of knowledge relevant to the NOP that was required, then the board would no longer be hampered by those who do not understand organic principles, practices, the Law and the regulations.
- too much is expected of the NOSB from the stakeholders. The NOSB is not an alternate to the NOP. And the board itself takes on too much either from pressure, influence, or sense of responsibility. Materials reviews – sunset and petitions – should be their priorities. Advice requested by NOP would be the next priority. Everything else is not essential or doable within the capacity of a volunteer board. More funds to support the work would help – for technical assistance to review materials, for research papers on topics under discussion, for surveys of certified operations on questions before the board, for compilation and analysis of public comments, and stipends for service.
- I would also like to see the elimination of oral comments as a way to allow more time at the NOSB meeting for discussion and deliberations. Oral comments are not effective – certainly they do not add new information to what has been submitted in written comments. More time for stakeholders to provide public comments would improve the quality, quantity and diversity of comments received. If it were possible, after compilation the NOSB Subcommittees could then have sufficient time to reflect on the consensus of

those comments or ask for technical assistance to sort out when comments provide conflicting information.

- I can't evaluate what tools the NOP is providing. See my comments above for what is needed to support the NOSB. I do believe that the NOP has not been clear – or has held back – in identifying limitations to the role of the board and the actions/recommendations they make. I get the sense that NOP has held back because they don't want to be criticized by some stakeholders for interfering with the board's "autonomy." But time, energy and resources are wasted when the NOP is not direct and clear about what can/cannot be done and what the process and timelines are for NOSB recommendations. I don't know if NOP does a training for NOSB members or meets with them to review the items on their agenda regarding priority and appropriateness, and to identify when other agency regulations might have to be considered or pose barriers. If NOP does not do this, it would be most helpful if they did.
- Most comments I've made above I believe would improve the process and relationship. Of course, trust and respect would go a long way in improving the relationship. At times, it has been adversarial. The idea of NOSB "autonomy" assumed by some board members and the stakeholders is not helpful to the process and relationship. The NOP and NOSB have different roles, but those roles are interdependent and more of a partnership, working together to advance and protect the organic sector.
- Review NL materials and facilitate the sunset process.
- A focal point for larger-scope discussions that include all stakeholders.
- Introduction of organic-specific topics for continuous improvement.
- Future: Should provide more leadership—big picture issues, discussion documents should solicit ideas and coalesce them over a few meetings.
- Future: More analysis and integration of ideas is needed from NOSB, not just reflection of public comments.
- Suggest that a streamlined sunset process is needed for materials that have been through more than 2 sunset cycles—that would represent ten years of established need for the material, along with lack of change in the factors considered during review! A streamlined process could look something like this--NOSB could announce the material's sunset and solicit public comments about topics, specifically related to the Board's material review criteria, that have changed in substantive, documented ways. The subcommittee (SC) would only put a material on its work agenda if there is objective evidence of significant change in its relationship to the evaluation criteria and then only look at the areas in which the evidence has changed. Otherwise, SC would recommend that the Board vote to relist as part of a Streamlined Sunset package. If any Board member is concerned about a material's inclusion in the Streamlined Sunset package, they could move to take it out of the package. The Board would do a single vote on the Streamlined Sunset Package. A streamlined sunset process would save both the Board and the public from unproductive work that is essentially repetitive without adding any value to the organic lexicon. If this is an agreed upon suggestion, it might be necessary to include it on the Farm Bill agenda since sunset is included in OFPA.
- The work agenda has been really full, especially Fall 2021. It's extremely difficult for the public to digest all these issues and respond thoughtfully, within the 30-day comment

period. It would be helpful if the Subcommittees gave notice to the public about their direction on individual topics before the comment period.

- Better subcommittee notes, posted in a timely manner can help the stakeholders be better prepared and provide more useful feedback to the NOSB. The current system posts notes that lack sufficient detail and are not timely.
- Perhaps we could limit the total number of petitions per meeting or post petitions ahead of the release of NOSB meeting materials, so stakeholders have more time to review, research, etc. Lengthy petitions (some have been well over 100 pages) exacerbate the workload. Compared to the petition process for registering materials with other state and local authorities, NOP's petition process lacks specificity.
- Consider switching to 4 meetings per year, two meetings dedicated to materials-petitions & sunset, and two meetings specific for discussion topics, 'big picture' ideas, and topics geared toward advancing and improving organic agriculture.
- NOSB needs access to a regulations writer when drafting Discussion Documents and Proposals so that the motions are accurately and completely reflecting the intent of the Board. NOSB should not be relying on cover letters to explain its intent or add thoughts that arose during the meeting. The Board should be voting on clearly articulated motions on which the public has had a chance to comment. The procedures for developing the cover letters and for their content is not clearly enough articulated to be playing such a significant role in the NOSB's policy development activities.
- Make time for more discussion documents to encourage thoughtful discussion about standards and new topics—not just materials.
- NOP has never made strong use of the Technical Advisory Panels mentioned in OFPA. Having a stable of experts that NOSB could call on for help with a range of topics would be great. A Technical Advisory Panel may also serve as institutional memory (very helpful on sunsets and precedents) for the Board as members rotate off the Board every 5 years.
- NOP should provide a clear scope of what is within NOSB's authority to propose as topics, i.e., topics that are specific to organic practices.
- There should be a balance between the topics proposed by the NOP and the NOSB, with a recognition that the system cannot get overwhelmed, so prioritization is also important. To help with creating balance, how about creating a mutual agreement about criteria for prioritization?
- Limit questions from NOSB members to NOP during the meeting to only technical questions about material listings and standards.
- Clearer conflict of interest criteria. For example, an NOSB member should not be serving on the Board or participating in the development of competing organic standards or certification programs.
- Here are some ideas about how we could shorten the time between emerging concerns and consideration of a NS Material by the NOSB:
- NOSB Materials SC could create a Discussion Document (similar to the way they approach Research Priorities) that asks all stakeholders to report NS materials of concern along with a brief explanation of the concerns about each material, focused on one or more of the material evaluation criteria. Subsequently, the materials could be put

on the Work Agenda for the appropriate NOSB Subcommittee(s) for additional research and consideration. At this point, the NOP Materials Staff (or a nice use of the Technical Review Panel mentioned in OFPA!) could provide some basic research on the material--if the SC feels that more information is needed, they could ask for a TR.

- NOP could require certifiers to submit information in their Annual Report to NOP about any emerging issues with NS materials. NOP would compile the information and submit it to NOSB for further work, as described above.
- NOP could put a question on its Audit Checklist so that auditors would be prompted to review the issue of problematic NS materials directly with certification staffers who are responsible for materials review activities.
- As part of the NOP's own Internal Audit, NOP's Materials Specialist could contact OMRI on an annual basis and request information about emerging issues with NS—an approach that is needed because OMRI is an extremely important player in the field of materials review, but NOP does not directly accredit or oversee OMRI.
- NOSB lacks autonomy and USDA lacks commitment to the NOSB recommendations
- NOSB is the private arm of the NOSB Public Private Partnership
- NOSB and OTA are stymied by the FACA processes and rules. Explore opportunities outside of FACA to have dynamic industry input in shaping continuous improvement in organic practices, standards and trade
- Accreditation of CBs and especially the management of the accreditation system itself, which is a topic that is only addressed in a cursory manner in the regulations—currently the accreditation section focuses largely on the responsibilities of the CB's but says little about the parallel responsibilities of the Accreditation body. Section 205.509 requires the NOP to comply with ISO 17011, but the accreditation system that is implemented with only the very minimum of transparency and oversight and evidence of compliance with this ISO standard.
- Continuous improvement should appear across the board as it is an essential element of practice. Accreditation, enforcement, practice standards need to move in tandem for consistency's sake.
- In oversight systems, internal audit, audit, management review, issuance and tracking of noncompliances, corrective and preventive action systems are the tools used to support continuous improvement.
- In the organic trade, tools used to support continuous improvement include surveys, and listening sessions, which are used to identify problems and suggestions about what can be done to improve. There is a natural feedback loop within supply chains to identify problems and find solutions that are workable, and effective.
- To the degree that regulatory work is considered CI, the implications of change need to be measured against the results of new/updated guidelines. At the same time, we need to find ways to carry out CI/Innovation work that is beneficial without being burdensome.
- Guidance is simply not a sufficient basis for implementing OFPA as a federal law—only regulations can do that. Guidance is a “soft” approach to continuous improvement as no one is actually required to follow it, which in turn leads to a lack of accountability and ability to conduct enforcement activities. Only the community-minded players will follow guidance--the bad actors will appeal or rebut noncompliances that rest on guidance.

- Guidance is no different than Best Practices. It should be used for education or explanation of how to meet regulatory requirements.
- Guidance can serve as a starting point for creating new standards. If guidance is needed to understand standards, then it is likely that the standard is not written clearly or is not reflective of actual practices—then it's time to revise or add to the standard.
- Change the system so that there is separation of function of standard holder vs accreditation agency.
- Contract with IOAS to do the audits and assessments of the CBs and make a recommendation to NOP about issuance of accreditation/continuation of accreditation.
- Challenge--the system was built and based on auditors who did not really understand organic. Now NOP has switched to using in-house auditors, but the systems and forms retain the fingerprint of this starting point.
- The accreditation system cannot comply with ISO 17011 (ISO/IEC 17011:2017 Conformity assessment—Requirements for accreditation bodies accrediting conformity assessment bodies) as required by §205.509 of the regulations, because the NOP is both the accreditation body and the standard developer and holder. When NIST looked closely at this system, neither NOP nor NIST could see a way past this foundational problem and NIST discontinued its relationship as the agency providing continuous oversight of the NOP. Since then, NOP has been using ANSI to provide Peer Review.
- Implementation of the Peer Review Panel has never been clear as OFPA and the NOP regulations are not congruent on this topic—what is clear is that the Peer Review Panel was meant to provide a publicly transparent view into the functioning of the accreditation process. Use the Farm Bill to clarify the goals for Peer Review in OFPA and to get NOP to update §205.509 of the regulation to align with this revised concept of the Peer Review Panel. Base the new system on the provisions of ISO 17011 §9.8, on Management Review. Include additional provisions for choosing people for Peer Review Panel, their qualifications, and an overview of the Panel's structure and function. Require that the Peer Review report be made publicly available.
- Significantly more emphasis on the Desk Audit procedures is needed. ISO 17011 includes these requirements so the auditors are more fully knowledgeable about a CB's Quality System Documentation as well as how the certifier should actually be conducting its activities. The Quality System Documentation must be assessed against ISO 17011 and noncompliances levied for insufficiencies in the CB's documentation that result in it not being complete and compliant with the ISO standard as well as the NOP regulations. The on-site audit compares what the CB says it does in its documentation with what it actually does—so work done in the Desk Audit greatly amplifies the value of the on-site audit.
- The Peer Review process needs to be implemented in an objective manner. Currently it is heavily influenced by the NOP managing the process. Further, the discrepancies between the section of the NOP Regulations and OFPA related to Peer Review should be fixed (see suggestions in Question #44, just above) and made congruent with the sections of ISO 17011.
- NOP should make greater use of certifiers' internal audit reports through careful follow-up of weaknesses identified by internal auditors. Lack of attention to this feedback

loop has resulted in lost opportunities for continuous improvement in both certification and accreditation systems.

- Require NOP accreditation system to fully comply with ISO 17011 (formerly ISO/IEC 61) and to apply for recognition of accreditation so that the system is subject to continuous oversight of timely correction of noncompliances with all applicable provisions of ISO 17011.
- Peer Review Panel has never been clear as OFPA and the NOP regulations are not congruent on this topic—what is clear is that the Peer Review Panel was meant to provide a publicly transparent view into the functioning of the accreditation process. Use the Farm Bill to clarify Peer Review in OFPA and to get NOP to update §205.509 of the regulation to align with this revised concept of the Peer Review Panel. Base the new system on the provisions of ISO 17011 §5.8, on Management Review. Include additional provisions for choosing people for Peer Review Panel, their qualifications and an overview of the Panel’s structure and function. Require that the Peer Review report be made publicly available.
- THE US should consider a standardize OSP that all certifiers must use to begin the certification & compliance process
- As an organization that works with many complex business seeking certification, I encourage companies to develop there OSP in accordance with the certifiers guidelines. It is the starting point in educating and training processors to the complexities of organic certification. It is a beginning template – not the end point
- The OSP is the key to success of Organic Certification, standardize the forms, expand the reach to meet new regulations and Continuous Improvement
- Probably the best tool is communicating that continuous improvement of practices is a requirement of keeping one’s certification. The first OSP is a benchmark, subsequent plans should measure improvement on those benchmarks. If improvement is not achieved and there is climate or other reasonable obstacles to achieving improvement, then certification is continued. If there are not reasonable explanations for lack of improvement, non-compliance with a detailed plan should be required. Of course, different measures for improvement would have to be identified.
- Requirements for maintenance of an operation’s OSP could be spelled out in more detail than just saying “provide updates”—this could be a way to ensure implementation of newly implemented requirements and standards.
- OSPs must be updated to include information to implement any new regulations and inspectors must verify all of these points. The inspection report should mirror the OSP.
- An OSP could have a section that summarizes all new requirements, so producers and handlers are sure to see the new points and to provide information on how they are implementing these new requirements.
- OSPs for handling operations focus largely on processing—we need more detailed standards for “non-processing handling activities” and OSP’s to match these standards.
- OSPs should be designed for flexibility (modules work well) so they can better reflect the scope of operations—otherwise there are many points in the OSP that end up being marked “not applicable” and even requiring explanations as to why the points are N/A to the operation. It’s better to focus attention on the parts of the OSP that are relevant.

- We need consistency in OSPs between certifiers. A solution to this could be that the NOP develop a single OSP format for each scope and require all certifiers to use it. (Although we are aware that certifiers won't like that direction!)
- The OSP can only serve as a vehicle for strengthening environmental outcomes if there are verifiable, measurable standards that address that scope. Once there are standards in place, the OSP is the first element of implementing a standard in that it describes how an organic operation plans to address a specific requirement.
- We advocate for OSP formats that support written answers, or at least a range of possibilities presented as checkboxes, as opposed to just a Yes or No answer because this provides more information to support the ensuing steps of the certification process.
- Use OSP modules so the operator can start with an OSP form that is customized for their operation. For example, why should every Farm OSP have a section about managing a greenhouse, when some farms don't have a greenhouse?
- OSP's should be developed by the NOP with multiple modules for production types and practices. Consistency among certifier's OSP's and Inspection report outlines would benefit certified operations and inspectors. It would also streamline the accreditation system, as accreditation auditors must review and analyze the OSP's of multiple certification bodies on a routine basis.
- Some OSPs are written unclearly and result in confusion that results in the need for clarification with the operator during Initial Review or worse, during a later step in the certification process. One element of Continuous Improvement is actively tracking problems, analyzing their root cause, and correcting them. With regard to the OSP, every time an operator appears to misunderstand a point on the OSP, it should be considered as the topic of a preventative action for the certification body's work on its OSP forms.
- The OSP is the foundation of all organic operations. It should not be viewed as an application or questionnaire (no check boxes) but rather a detailed description of an operation's applicable practices for how they comply with the Act.
- The final question on the OSP should be: "Do you have any comments about your experience with completing this OSP form or ideas for improving the form?"
- An effective ACA with dynamic leadership that is actively engaged with NOP and NOP being responsive to certifications challenges and interpretations
- Much more emphasis should be placed on risk assessment.
- Continue the integration of Organics into the Federal Regulation process.
- Certification, continuous improvement is different for each entity being certified. A farm that has been in Organics for 20 years will probably need a few tweaks, where as a new farming operation will need years to bring their operation into the upper tier of Organics. Same for processors, handlers and retailers.
- Most large companies have compliance officers, we need to see integration of Organics into all other regulatory processes
- The lack of markets for transitional crops, at a time when crop yields are taking a big hit.
- Provide a market or direct government assistance as is done in other countries
- If direct government assistance is not possible then transitional certification should be established
- That Organic Certification becomes a 24 month not a 36 month transition

- Like whole herd conversion, a field can only be in Transition once, no flipping in and out of Organics
- No priority sectors, we cannot choose winners and losers in a open economy
- Large buyers have and could buy the Certified transitional product at a small premium then buy the Certified Organic product at a slight discount to balance out the assistance.
- Direct government assistance, to help domestic farmers compete with overseas farmers who are getting direct government assistance to transition to Organics
- The issue of Organic Certification being tied to fees is a red herring, little if any Certifications are done for fees. There should be federal assistance, cost sharing, to bring all certifiers up to equivalent digital capabilities for live time tracking of harvest and production records.
- It is a fact that Organic Certification would not have been possible when the USDA first started regulatory oversight of Organics. It was the independent and state Organic Certifiers that on their own financial strength allow the oversight of the Organic industry. Federal assistance would be recognition of the work done by these organization. It would also allow easier reviews of the Certifiers if they were all operating on the same digital systems
- Regulatory guidance should be used as a starting point for educating an operation and be viewed as shared best practices. Guidance should be accepted as a form of knowing if you are on par with requirements. For environmental outcomes, NOP should consult with Universities, Researchers and Extension agents, as well as certifiers and certified operations, to develop “best practices” guides or guidance documents.
- A lot of work has been done over the past decade to align organic regulations with the work of NRCS. The flexibility in OSPs has been a barrier to more comprehensive alignment with NRCS conservation plans. The regulatory guidance has provided an opportunity for training and education. The challenges are noted above.
- Tax rebates or deductions for the difference between organic and conventional pricing during the years of transition. This would be even more beneficial now, without a transitional certification or logo.
- We should check in on what other countries (and the EU) are doing. They are already acknowledging that organic agriculture is better for the environment than conventional is and as such are able to set goals and incentives.
- Create standards (or limitations) for the conversion of native ecosystems to agricultural production.
- More emphasis on adding minimum tons/acre organic matter to the soil—as opposed to ‘improving’ the % organic matter--soils differ greatly on what happens to organic matter, once it is applied.
- Regulating the conditions under which soluble fertilizers may be used, to prevent impacts on groundwater and eutrophication of surface waters.
- How handlers can demonstrate they are improving or benefiting environmental outcomes.
- Increased specificity around erosion tolerance and acceptable biodiversity and crop rotation investments. Crop rotations are a big area where producers can skirt the intention of the rule.

- Generally speaking- cost, time, and risk. Farmers must learn a complex set of regulations and make changes to practices to meet the requirements of the standards. Starting from scratch can be very intimidating, as can setting up new procedures (record keeping, for instance). There is also very little market recognition for transitional product and no organic premium to help with the costs and risks of transitioning. Transitioning operations don't have a clear connection with a certifier who can help explain regulations and the certification process or provide information about new or changing requirements.
- We would like to point out this report conducted by OTCO and Oregon State University: <https://tilth.org/education/resources/breakingground/>. It provides valuable information about the obstacles/barriers realized by those who fit one of 4 'profiles'- certified organic, actively transitioning, split-operation, and not pursuing certification. The research shows that the obstacles and motivations change based on which category or 'profile' a grower fall. As such, we recommend you look at the full report. Below are some key points identified in the report, irrespective of 'profile'.
 - Major obstacles- weed management and cost of certification.
 - Minor obstacles- learning process, recordkeeping requirements, cost and availability of organic inputs, managing soil fertility, obtaining organic price premiums & information.
 - Other concerns- availability of certified handling/processing facilities, and cost and availability of labor.
- The United States needs to reframe the narrative around safe, productive, climate-friendly agriculture and set goals to increase organic production. Without federal buy-in for organic, our conventional agriculture system will continue to overshadow and erode any efforts to support transition to organic. Cultural barriers are in place that have been heavily influenced and maintained by outsized funding from agrichemical lobbyists and marketing.
- From our perspective, we feel that NRCS and Extension Services are best suited to provide support to transitioning farmers. The priority should be equipping NRCS and Extension with resources such as adequate support staff and toolkits so they can provide one-on-one support to farmers that need assistance and guidance.
- See above mentioned report about Transitioning (<https://tilth.org/education/resources/breakingground/>). The top ranked suggested areas of [non-financial] support were:
 - Mentoring from experienced organic farmers.
 - One-on-one technical assistance during transition.
 - In person workshops or short courses.
 - Books or other printed materials.
 - Online courses or webinars.
- Adopt a values-based approach to appeal to a wider audience of farmers. Farmers pursuing transition are generally motivated to do so through an alignment of their personal values with benefits they ascribe to organic production.
- Provide individualized, in-person support. Mentoring from experienced organic farmers and one-on-one technical assistance.

- Develop more effective weed (pest) management strategies. Effective outreach and support on weed and pest management in organic systems should include long-term trials, on-farm demonstrations and help farmers engage in participatory research.
- Learn more about the relationship between yield and successful transition.
- Our opinion is, yes, we should have a federal program to certify transitional product but it should not be for use in retail. We need to get as many farms as possible using organic methods, as soon as possible. There are so many benefits for the Earth, for individual farms, and for society. A transitional certification program also has benefits for certifiers and for the market in forecasting future needs and opportunities. Other benefits include fraud prevention, certification forecasting, and smoother transition to certification for individual operations.
- However, it is important to address risk, cost, and time before moving on a transitional certification program. You need a market for transitional product to drive the need for a transitional certification program. Need to consider the impacts on other parts of the existing regulations such as how to consider transitional product when calculating %s in processed products, labeling, definition, scope (can transitional products only be fresh commodities, or can they be processed products too?).
- Lastly, we suggest that a transitional certification not include a retail label/logo. There is already too much label confusion in the marketplace. A logo at point of sale would be useful, but not necessarily a logo on printed packaging. If a customer-facing, retail logo would accompany the transitional certification then it should closely resemble the current USDA organic seal.
- If the market is not strong enough, an influx of transitional product can reduce prices and market share for existing certified farmers. Providing assistance to new organic farmers seems inherently unfair to the farmers who went through transition without assistance—but a best-case scenario would be to emphasize the environmental benefits (more organic acres), which is something that organic farmers value a lot.
- Impacts on the entire supply chain must be considered—not just the farmers. Every step along the chain that brings the food to the consumer will have to adapt to managing parallel product lines for organic and transitional products if the transitional label is regulated. For businesses like produce distributors, this is a significant issue because they handle so many products and they would potentially have to track paperwork and product of the same varieties, from the same growers in both transitional and organic forms!
- Certification decisions are inherently tied to fees as long as certification is a fee-for-service business. Everyone working in certification understands that speaking up about problems can result in loss of fees. Is there such a thing as a “party without a conflict of interest” if people get paid for their services within the certification system?
- It’s also important to recognize that the viability of a certification business ultimately rests on its reputation, so taking shortcuts with the certification process will end up being a problem.
- CBs should be the entities distributing USDA’s organic cost share funds to certified operations. This would result in higher usage of the program and create greater efficiencies for USDA, CBs, and certified operations.

- Another consideration is that it would be nice if we didn't have to pay so much for certification. Certification fees could be based on the services required, as opposed to sales. For example, a distribution operation might sell \$1B worth of organic product (at a low margin) and require very little service throughout the year (OSP updates, labels, formulas, etc.). This operation likely pays a max fee, upwards of \$40,000-\$50,000 annually and require very little time commitment from the certifier. Another operation might sell \$1M in organic products and submit new labels and formulas weekly, requiring a major time commitment from certifiers. It's no secret that Handling operations subsidize certifier's ability to certify small farms, and operations with high sales provide a majority of a certifier's revenue, however an alternative model based on time spent, not sales, might be fairer.
- A well-trained inspector who has knowledge of and experience with the type of operation they are inspecting is the best tool for certification.
- Inspectors are required to be agents of the NOP. OSP is a consistent form with continuous improvement measures. Mandates and funding for organic specialists who can teach/train/measure/monitor organic operations through grants to organizations and in NOP and other USDA agencies and offices
- Require NOP to develop standards for "Non-Processing handling activities," as proposed in by OPWC in comments about SOE and for the Fall 2021 NOSB meeting.
- Much like private food safety standards, have committees for reviewing and updating standards on a routine basis to make sure standards are consistent with trends and current practices/innovations, NOP should create an advisory group specific to analyzing current standards and suggest improvements or updates based on GAP analysis.
- Provide funding for research that can quantify the benefits of organic practices- water holding capacity of soils, carbon sequestration, biological diversity, etc. This information can then be used to "pay back" organic farmers for the benefits that their production methods provide to society.
- To set ambitious goals for organic production requires the USDA to first affirm that organic production systems are better for the planet and its people. Without recognizing this, it's hard to make the case we should be setting goals in the first place. Instead, USDA has opted to avoid any organic/conventional comparison and as you mention in your article, it's clear why. Agrichemical companies will spend whatever it takes to ensure organic is never called out by USDA as a solution or 'better than' conventional systems. They have everything to lose in an organic future.
<https://theconversation.com/unlike-the-us-europe-is-setting-ambitious-targets-for-producing-more-organic-food-169078>
- NRCS needs to recognize organic as a beneficial system (vs individual practices) and provide expanded financial and technical support for it. This could look like an NRCS conservation practice standard for Transition to Organic, which was attempted by several states nearly a decade ago and failed because the agency couldn't justify a practice that reflected a holistic system of management.
- Can the Farm Bill reestablish NOSB outside of the constraints of FA