



ORGANIC FARMERS ASSOCIATION

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2017-2018 Policy Priorities

NOSB ORGANIC POLICY PRIORITIES

In advance of the October 31, 2017 NOSB Meeting in Jacksonville, FL, Organic Farmers Association (OFA) has established a policy position on hydroponics, the OFA position follows the recommendations of the NOSB Crops Subcommittee.

1. Hydroponics

Position: OFA supports the work of the National Organic Standards Board (NOSB) and urges the National Organic Program (NOP) to stop the certification of hydroponic systems until specific regulations for these types of operations go through the NOSB recommendation process and are then adopted through the proposed and final rule process by the NOP.

A. Aeroponics

Aeroponics systems do not require soil or a root-zone medium. The roots are intentionally suspended in midair, in part to expose them to more atmospheric oxygen to aid plant growth. The roots are regularly sprayed with water that contains water-soluble nutrients.

Position: OFA is **OPPOSED** to allowing aeroponic production systems to be certified organic because they do not meet the requirements of OFPA or the Organic Rule.

B. Aquaponics

Aquaponic production is a form of hydroponics in which plants get some or all of their nutrients delivered in liquid form from fish waste. Aquaponics is defined here as "A recirculating hydroponic system in which plants are grown in nutrients originating from aquatic animal waste water, which may include the use of bacteria to improve availability of these nutrients to the plants. The plants improve the water quality by using the nutrients, and the water is then recirculated back to the aquatic animals." The NOP has strict standards for handling animal manure in terrestrial organic production, but no such standards exist to ensure the safety of plant foods produced in the fecal waste of aquatic vertebrates. Also, the NOP has not yet issued standards for organic aquaculture production, upon which aquaponic plant production would be dependent.

Position: OFA is **OPPOSED** to allowing aquaponic production systems to be certified organic at this time. If aquaculture standards are issued in the future, and concerns about food safety are resolved, aquaponics could be reconsidered.

C. Hydroponics and Container Growing

The word "hydroponics" comes from two Greek words: hydro, meaning water; and ponos, meaning labor. In popular use of the term, hydroponics means growing plants by providing the plants' nutrition in liquid form. The Merriam-Webster Dictionary definition of hydroponics is "the growing of plants in nutrient solutions with or without an inert medium (such as soil) to provide mechanical support."

Proponents of allowing hydroponic production to qualify as certified organic have created confusion in the hydroponics discussion by attempting to redefine some forms of hydroponic production as “container growing.” That creates confusion because, in fact, all hydroponic production is done in containers, and as noted above, hydroponics has traditionally been defined by the use of nutrient solutions to feed plants, not by the particular type of rooting medium used.

Position: OFA SUPPORTS the NOSB Crops Subcommittee draft recommendation, which states, “For container production to be certified organic, a limit of 20% of the plants’ nitrogen requirement can be supplied by liquid feeding, and a limit of 50% of the plants’ nitrogen requirement can be added to the container after the crop has been planted. For perennials, the nitrogen feeding limit is calculated on an annual basis. Transplants, ornamentals, herbs, sprouts, fodder, and aquatic plants are exempted from these requirements.”

Position: OFA SUPPORTS the NOSB Crops Subcommittee draft recommendation, which states, “Any container production system that does not meet the standard of a limit of 20% of the plants’ nitrogen requirement being supplied by liquid feeding, and a limit of 50% of the plants’ nitrogen requirement being added to the container after the crop has been planted is defined as hydroponic and should not be allowed to be certified organic. For perennials, the nitrogen feeding limit is calculated on an annual basis. Transplants, ornamentals, herbs, sprouts, fodder, and aquatic plants are exempted from these requirements.

GENERAL ORGANIC POLICY PRIORITIES

1. Organic Livestock and Poultry Practices Rule (OLPP)

The OLPP or “animal welfare” rule would allow the NOP to consistently enforce stronger animal welfare standards on organic farms and remove loopholes being taken advantage of by some large operations. The USDA has delayed implementation of the rule until November 14th and in June held a public comment period asking whether it should be implemented at all.

Position: OFA SUPPORTS the Organic Livestock and Poultry Practices (OLPP) rule and asks the USDA to implement the rule by November 14, 2017 without further delay. Input from organic farmers, researchers, the National Organic Standards Board (NOSB), and the public over the past ten years, led to the development of the rule, and it needs to be implemented to preserve the integrity of the organic seal.

2. Organic Checkoff: Organic Research and Promotion Program (ORPP)

The proposed Organic Research and Promotion Program (ORPP), “organic checkoff” would require all certified organic operations to submit annual gross sales reports, and all entities whose organic gross sales exceed \$250,000 will pay 0.001% of their annual organic net sales. The checkoff fund would be directed by a board appointed by the Secretary of Agriculture. It has been proposed that the funds would be proportioned as follows: 15% administration, 21% discretionary funds, 21% organic promotion, 11% agriculture research, 10% marketing research, 11% producer education and 10% industry information.

Position: OFA OPPOSES the Organic Checkoff.

3. Organic Liaison at USDA

From 2010 – 2014, the USDA funded a position titled: Organic and Sustainable Agriculture Policy Advisor, which served the role of coordinating on organic issues across different USDA agencies under

the Secretary of Agriculture. This position was helpful in coordinating organic farming policy issues and assisting with the “Know Your Farmer, Know Your Food” initiative.

Position: OFA SUPPORTS refunding the Organic and Sustainable Agriculture Policy Advisory staff position to serve as a communications link between the National Organic Program and the Office of the Secretary of Agriculture to work directly with the Secretary, the Deputy Secretary and the agency leaders within USDA to coordinate organic policy and educate the Department’s personnel about organic farming, what the National Organic Program (NOP) does, and why it’s important to the other goals of USDA.

2018 ORGANIC FARM BILL PRIORITIES

1. Expanded Organic Research

Funding for organic research benefits all U.S. farmers, as the basis of organic agriculture is soil health and alternative pest and disease management strategies—research in these areas benefit both organic and conventional farmers. Unfortunately, over the past five years, while overall funding for agricultural research has grown significantly, funding for organic research has stagnated. For example, USDA’s own data shows that funding for organic in the flagship competitive grant research program, the Agriculture and Food Research Initiative (AFRI), has averaged about two-tenths of one percent (0.2 percent) annually. In addition, funding for USDA’s organic-specific research programs has been stagnant for years.

The bipartisan Organic Agriculture Research Act (H.R. 2436) has been introduced in the House to authorize \$50 million in mandatory funding annually for the Organic Agriculture Research and Extension Initiative (OREI). OFA strongly supports this legislation and seeks a Senate companion to the bill as well, because funding for OREI has been stagnant at \$20 million since fiscal year 2010, while many of the production challenges of organic farmers go unaddressed.

Position: OFA SUPPORTS passage of the Organic Agriculture Research Act (HR 2436).

2. NOP Enforcement to Ensure Organic Integrity

Organic integrity is the bedrock of the organic label. We must have equitable and honest enforcement of the National Organic Standards across all commodities, states, farm size, and throughout international trade. Please review the following policy statements regarding varying aspects of necessary increased NOP enforcement.

A. Position: OFA SUPPORTS full and equitable enforcement of NOP standards: USDA should take immediate action to bring non-complying operations and their organic certifying agents into compliance, or exclude them from the program. Congress should use its oversight authority to ensure that USDA takes the necessary actions to tighten enforcement.

B. Position: OFA SUPPORTS the Organic Farmer and Consumer Protection Act, which includes new Farm Bill requirements for USDA, in coordination with Customs and Border Protection, to implement enhanced procedures to track organic imports and ensure that imported products fully comply with U.S. organic standards.

C. Position: OFA SUPPORTS a consistent interpretation and implementation of §205.237 Livestock feed and §205.239 Livestock living conditions. There must be a consistent and

required policy and calculation matrix for pasture dry matter intake and pasture consumption for the 120-day organic dairy pasture rule.

3. Organic Certification Cost Share

The National Organic Certification Cost Share Program and the Agricultural Management Assistance Act (AMA), provide organic farmers with modest reimbursements for a portion of their annual organic certification fees.

Position: OFA SUPPORTS renewal of organic certification cost-share programs, with adequate mandatory funding to meet projected demand. Additional flexibility should be given to the Secretary to determine other unique costs faced by organic farmers that should be reimbursed.

4. NRCS: EQIP, CSP, CRP Programs for Extended Organic Support.

Natural Resource Conservation Service programs help farmers and ranchers implement and enhance conservation systems on their operations. These programs align with conservation priorities of organic farms and should be expanded to encourage more organic participation so that organic farmers are supported in continually improving their farming operations.

A. Environmental Quality Incentives Program (EQIP)

Position: OFA SUPPORTS that the payment limits under the Organic Initiative within the Environmental Quality Incentive Program (EQIP) should be equalized with the rest of the EQIP program, to ensure full opportunity for organic farmers to participate in the program (raising 6yr payment limit from \$80K to \$450K).

B. Conservation Stewardship Program

Position: OFA SUPPORTS Congress to direct USDA to recognize required organic practices within the full suite of conservation programs including the *Conservation Stewardship Program (CSP)* and expand CSP organic bundles to transitioning organic farmers. CSP transition bundles will assist farmers with implementing organic practices, provide technical assistance during the transition period, and offset the financial costs of transitioning.

C. Conservation Reserve Program

Position: OFA SUPPORTS reform of CRP to include organic producers and producers planning to transition to organic as additional allowed applicants to be eligible to participate in CRP transition incentive payments (TIP).

5. Crop Insurance Improvements for Organic Producers

Organic farmers should be able to insure their crops based on organic prices, not conventional prices. While USDA's Risk Management Agency (RMA) has made progress in this area, crop insurance programs still need updating to make them relevant and competitive for organic and transitioning to organic farmers.

A. Organic Price Elections

Position: OFA SUPPORTS Congress to direct the Risk Management Agency (RMA) to prioritize development of additional *organic price elections* for crop insurance coverage, and review policies that cap *Contract Price Addendums* at two-times the conventional price election for any specific crop. In addition, to allow organic transition producers to calculate the Actual Production History Yield (APH) for acres under organic transition using the APH of other organic acres on their farm, rather than the county T-Yield for the acres under transition.

B. Whole-Farm Revenue Protection

Position: OFA SUPPORTS continuation of *Whole-Farm Revenue Protection* established in the 2014 Farm Bill and recognize the change in farm revenue after a farm has transitioned to organic. Eliminate the 30% cap on increased production value under the expansion provision.

C. Storage Loan Organic Price Elections

Position: OFA SUPPORTS Congress to direct the Farm Service Agency to develop organic price elections for *storage loans* offered. Producers will then have the ability to access working capital based on the actual value of their crops to cash flow their operations. Utilize existing organic price data developed by RMA to establish storage loan prices.

D. Dairy Margin Protection Program

Position: OFA SUPPORTS extension of the Dairy Margin Protection Program to cover organic dairy operations by using the cost of organic dairy feed and inputs to calculate organic milk margin. This change would make the program relevant for the needs of small to mid-size dairy operations.

6. Beginning Farmer and Rancher Development Program (BFRDP) Organic Priority Funding

Over the last decade Americans have become increasingly interested in where our food comes from, how it is produced, and by whom. This interest has driven the organic food market to become the fastest growing agricultural sector, creating opportunities for beginning farmers to capitalize on this increased market demand as they start their businesses. Unfortunately, high barriers to entry, such as difficulty accessing affordable farmland, high upfront startup costs, and inadequate training and technical assistance, make it difficult for beginning farmers and ranchers to pursue careers in agriculture.

Young and beginning farmers entering agriculture today have different needs and face different challenges than those who started farming decades ago. These new farmers often operate smaller farms, run diversified operations, and come from non-farm backgrounds and therefore struggle to access farmland, which has traditionally been passed down from generation to generation. The majority of these beginning farmers chose to farm using organic methods and need specified technical assistance to enter this growing consumer market.

Position: OFA urges Congress to include a BFRDP funding priority for projects focused on providing organic technical assistance to beginning farmers.

7. Organic Production Market and Data Initiatives (ODI)

The USDA's Organic Production Market and Data Initiatives (ODI) collects information vital to maintaining stable markets, creating risk management tools, tracking production trends, and increasing exports. Good and consistent data collection is imperative to support a growing agricultural industry.

Position: OFA SUPPORTS reauthorization of the Organic Data Initiative to provide \$5 million per-year in mandatory funding for USDA organic data efforts, as well as a continuation of existing language authorizing additional funding through the annual appropriations process.

8. Public Seeds & Breeds Research Funding

Both organic and conventional farmers need seeds and animal breeds well-suited to their local growing conditions, changing climates, and farming systems. Without these tools, farmers are handicapped and their productivity is negatively affected. Congress, USDA, and our nation's public research universities

must work together to reinvigorate public plant and animal-breeding programs to provide farmers with continually improving and regionally adapted seeds and breeds.

Position: OFA SUPPORTS the new Farm Bill requiring USDA's National Institute for Food and Agriculture (NIFA) to use its existing competitive grants research programs to collectively allocate \$50 million annually to public plant and animal breeding programs, with a priority focus on developing regionally adapted organic cultivars and animal breeds.

9. The Importance of the National Organic Standards Board (NOSB)

The National Organic Standards Board (NOSB) was created as a citizen stakeholder advisory committee to allow for a formalized process to ensure grassroots organic input into standard-setting and decision-making processes at USDA. The Organic Foods Production Act (OFPA) statutory language lays out the details of the authorities and composition of the NOSB to ensure that the various stakeholder sectors of organic (farmers, handlers, retailers, environmental/conservationists, public interest/consumer groups, and scientists) all have a seat at the table. The Board meets twice a year, and invites the public to provide comments during the meeting, at pre-meeting webinars, as well as in writing before the meeting. In reality, there is no place in our food system that is more transparent than in organic production, and the role of the NOSB is central to that transparency.

POSITION: OFA STRONGLY OPPOSES any efforts to dilute the authority and role of the NOSB in the overall standard-setting process, or to seek statutory changes to the delicate balance of stakeholder slot allocations for the Board membership.