



# ORGANIC FARMERS ASSOCIATION

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## 2019 POLICY PLATFORM

Each year, Organic Farmers Association solicits input on policy priorities and policy positions from all U.S. certified organic farmers and organic farm organizations, which we did in December 2018. The OFA Policy Committee reviewed the results, identified the top priorities, and drafted policy statements from this broad-based solicitation to submit to OFA members for comment, which was completed in April 2019. In May, farm members of Organic Farmers Association voted on these policy positions.

For a position to become adopted as OFA policy, it must have 60% of the popular national vote and 60% popular support in at least two-thirds of the regions. Each year, new adopted policies will become part of the Organic Farmers Association Policy Platform.

In 2019, all proposed policy positions were passed by the Organic Farmers Association Farm Members. All proposed positions received more than 60% of the popular national vote and more than 60% popular support in each of the six regions.

## CONTENTS

|  |   |
|--|---|
| ORGANIC INTEGRITY.....                       | 2 |
| BEGINNING FARMER & MARKET DEVELOPMENT.....   | 3 |
| CROP INSURANCE.....                          | 4 |
| CLIMATE CHANGE & ENVIRONMENTAL POLICIES..... | 4 |
| IMMIGRATION.....                             | 4 |
| PUBLIC SEEDS & BREEDS.....                   | 4 |

## ORGANIC INTEGRITY

**POSITION:** OFA SUPPORTS the reactivation of the 2015 Origin of Livestock Proposed Rule and the publication of a Final Rule in 2019 that revises the current regulation so that it aligns with the principles expressed in the preamble of the December 21, 2000 Federal Register National Organic Program Final Rule (page 80570).

**POSITION:** OFA SUPPORTS an immediate implementation of the Final Origin of Livestock Rule and asks the USDA to prioritize the following prior submitted comments in the writing of the Final Rule:

- a. A producer as defined by the USDA NOP may transition bovine dairy animals into organic production only once.
- b. A producer is eligible for this transition only if they convert an entire established non-organic dairy operation to organic production at the same geographic location within a defined 12-month period. Once that transition has started, other non-organically certified animals cannot be added to the herd.
- c. This transition must occur over a continuous 12-month period prior to production of milk or milk products that are to be sold, labeled, or represented as organic.
- d. A producer must not transition any new bovine dairy animals into organic production after the end of the 12-month transition period.
- e. A producer is not eligible for the exemption if it has been used by a Responsible Connected person who has 20% or more ownership share in their legal entity.
- f. The certifying entity will file an organic system plan prior to the start of transition and the transition process is overseen by the certifier as part of their accountability.
- g. Transitioned animals must not be sold, labeled, or represented as organic slaughter stock or organic bovine dairy animals.
- h. If organic management of the dairy animal, starting at the last third of gestation or at any other time it has been organic, is interrupted, the animal cannot be returned to organic certification.
- i. Split bovine conventional and organic milking herds at the same location are prohibited.
- j. Once the regulation is finalized all entities will be required to immediately meet the requirements of the Final Rule. There will be no implementation period.

**POSITION:** Consistent with NOSB's April 2011 recommendation, the Organic Farmers Association SUPPORTS re-listing Sodium Nitrate on 7 CFR 205.602 without annotation. This rulemaking action would make sodium nitrate prohibited in organic farming and eliminate the use of this soluble, plant-available fertilizer, which circumvents natural nutrient cycling in organic soil management.

**POSITION:** OFA SUPPORTS that all National Organic Program materials go through the OFPA required independent five-year sunset review by the NOSB to remain on the National List and that the USDA immediately stop labeling a material listing as an “invalid listing” as no definition nor explanation of procedures for determination and management for the term exists.

**POSITION:** OFA SUPPORTS requiring that the farmer-seat on the NOSB is filled by a farm operator (according to USDA-ERS definition).

**POSITION:** OFA SUPPORTS a consistent interpretation and implementation of §205.237 Livestock feed and §205.239 Livestock living conditions that upholds the intention of the rule; requiring access to pasture during the pasture season and a minimum of 120 days on pasture and 30% daily dry-matter intake from pasture for each herd subgroup (milking cows, dry cows, heifers). 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. Risk based unannounced additional inspections must be routinely conducted to ensure compliance.

## BEGINNING FARMER & MARKET DEVELOPMENT

**POSITION:** OFA SUPPORTS a federal Dairy Supply Management program, to stabilize milk supply and prices for both conventional and organic dairies and their processors.

**POSITION:** OFA SUPPORTS legislation which adds certified organic farmers to the “public service loan forgiveness program”.

**POSITION:** OFA SUPPORTS the preservation of agricultural lands for organic production through programs such as agricultural land trusts, agricultural land easements, and agricultural land use protections.

**POSITION:** OFA SUPPORTS targeted outreach, training, information, technical assistance, land access and ownership on organic farming systems, USDA organic certification and transition, and organic market development to historically underserved, minority and beginning farmers through USDA agency programs, land grant institutions and NGOs.

**POSITION:** OFA SUPPORTS legislation such as the PRIME ACT, which permits state-inspected meat to be sold within that state, thus eliminating the intrastate marketing barriers placed on livestock farmers by the requirement for USDA inspected livestock slaughter and processing facilities which are few and far between.

**POSITION:** OFA SUPPORTS the USDA prioritizing the collection of accurate organic commodity, poultry, dairy, livestock, and specialty crop pricing data, adjusted for inflation, so that market decisions can be made on accurate pricing information.

**POSITION:** OFA SUPPORTS organic transition incentive programs that provide financial and technical assistance to non-organic farmers to help them convert land to certified organic management systems.

**POSITION:** OFA SUPPORTS programs that facilitate the creation of small farmer production, processing and marketing cooperatives.

## CROP INSURANCE

**POSITION:** OFA SUPPORTS crop insurance policies that do not require the organic certificate be dated prior to July 15 of the crop production year for which an organic producer receives the organic price.

**POSITION:** OFA SUPPORTS the creation of new crop insurance tools that serve the needs of diversified organic growers.

## CLIMATE CHANGE & ENVIRONMENTAL POLICIES

**POSITION:** OFA SUPPORTS the vision of a Green New Deal that recognizes the vital role of organic agriculture as a part of the solution to climate change and asks that Organic Farmers Association has a seat at the table.

## IMMIGRATION

**POSITION:** OFA SUPPORTS immigration reform that 1) legalizes the existing farm labor force, 2) retains the current H-2A program as is for those who need it, and 3) adds an agriculture work visa program that would require a specified number of years of at-will agricultural work for a specified minimum number of days per year that could lead to a green card if desired.

## PUBLIC SEEDS & BREEDS

**POSITION:** OFA SUPPORTS increased and dedicated funding for organic public seeds and breeds research.

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## **ABOUT ORGANIC FARMERS ASSOCIATION**

The mission of the Organic Farmers Association is to provide a strong and unified national voice for domestic certified organic producers. With the purpose to build and support a farmer-led national organic farmer movement and national policy platform by: developing and advocating policies that benefit organic farmers; strengthening and supporting the capacity of organic farmers and farm organizations; and supporting collaboration and leadership among state, regional and national organic farmer organizations. Learn more at [OrganicFarmersAssociation.org](https://OrganicFarmersAssociation.org).