



# ORGANIC FARMERS ASSOCIATION

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## 2018 Proposed Policies- FARM MEMBER BALLOT OPEN: June 5-July 8.

### 1. Introduction

Each year, Organic Farming 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 2017. 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 May 2018.

Now, the certified organic FARM MEMBERS of Organic Farmers Association, will vote 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. Adopted policies will become part of the Organic Farmers Association Policy Platform.

**BALLOT OPEN: Tuesday, June 5 -- Sunday, July 8.**

**BALLOT MUST BE POSTMARKED BY SATURDAY, JULY 7.**

If you are not yet a certified organic farm member of Organic Farmers Association but want to participate in the vote, join today to receive your ballot.

Only one ballot per farm is accepted to honor our ONE FARM, ONE VOTE policy.

Proposed policy positions are organized by topic.

1. Organic Integrity
2. Contamination
3. Hydroponics
4. Organic Certification Cost Share
5. Organic Research
6. National Organic Standards Board (NOSB)
7. Organic Livestock and Poultry Practices Rule
8. Crop Insurance
9. Food Safety Modernization Act (FSMA)
10. Beginning Farmers & Ranchers
11. Organic Market Growth
12. NRCS: EQIP, CSP, CRP
13. Public Seeds & Breeds
14. Organic Production Market & Data Initiatives (ODI)
15. Organic Liaison at USDA
16. Submit Ballot Information

## 1. NOP Enforcement to Ensure Organic Integrity

### **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.*

#### **PROPOSED POSITION:**

OFA SUPPORTS full and equitable enforcement of NOP standards: USDA should take immediate action to focus first on high risk operations and to bring non-complying operations and their organic certifying agents into compliance or exclude them from the program. USDA should be required to provide more transparency about the enforcement actions taken by NOP and their accredited certifying agents. Congress should use its oversight authority to ensure that USDA takes the necessary actions to tighten enforcement.

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#### **PROPOSED POSITION:**

OFA SUPPORTS strengthening USDA import inspection, review, and testing protocols to ensure organic label integrity.

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#### **PROPOSED 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.

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#### **PROPOSED 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.

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#### **PROPOSED POSITION:**

OFA SUPPORTS the USDA hiring leadership that has demonstrated expertise and experience in organic production, and USDA providing staff education that results in organic knowledge and proficiency.

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#### **PROPOSED POSITION:**

OFA SUPPORTS that USDA develop specific qualification criteria, expertise, and testing to illustrate proof of knowledge and that this be required of all accredited certifiers, inspectors and review staff to result in consistent oversight and interpretation of the rule for each scope of production.

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#### **PROPOSED POSITION:**

OFA SUPPORTS the clarity and integrity of organic standards in the marketplace.

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**PROPOSED POSITION:**

OFA SUPPORTS a fully funded certification and accreditation process that is transparent, risk-based (prioritization of problem areas) and requires producers and handlers to uphold high integrity in their organic production practices.

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**PROPOSED POSITION:**

OFA SUPPORTS the certification of all non-transport handlers and brokers of bulk, non-retail certified organic products including importer-handlers of organic products and ingredients.

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2. Contamination

**Contamination**

*Contamination is a major threat to the integrity of organic production. Avoidance and mitigation methods as well as compensation for damage and market losses caused by genetic or pesticide trespass must be developed and implemented. Pesticide applicators must have stricter rules for use and application of materials. Research and education is needed for pesticide applicators and users of genetically engineered technologies.*

**PROPOSED POSITION:**

OFA supports prevention of, and compensation for losses associated with, damage caused by genetic engineering and pesticide contamination of organic crops and other affected areas.

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3. Hydroponics

**Hydroponics**

*Hydroponics In 2010, the National Organic Standards Board (NOSB), by a 14 to 1 vote, recommended that hydroponic production not be allowed to be certified organic, stating “systems of crop production that eliminate soil from the system, such as hydroponics or aeroponics cannot be considered as examples of acceptable organic farming practices...due to their exclusion of the soil-plant ecology intrinsic to organic farming systems and USDA/NOP regulations governing them.” Many USDA-accredited certifying agencies have avoided certifying hydroponic operations as organic because of the long-standing requirement—rooted in the Organic Foods Production Act (OFPA)—that organic production must be in the soil. Organic Farmers Association is concerned by the National Organic Program’s (NOP) January 25, 2018, statement that “Certification of hydroponic, aquaponic and aeroponic operations is allowed under the USDA organic regulations and has been since the National Organic Program began.” We are concerned this action is revisionist history and an incorrect interpretation of organic law.*

**PROPOSED POSITION:**

OFA OPPOSES organic certification of hydroponic production.

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**PROPOSED POSITION:**

OFA urges the National Organic Program (NOP) to revoke the organic certification of currently certified hydroponic systems and cease certification of new hydroponic operations.

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#### 4. Organic Certification Cost Share

##### **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.*

##### **PROPOSED 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 support programs beneficial to transition and ongoing organic production.

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#### 5. Organic Research

##### **Organic Research**

*U.S. organic production lags far behind U.S. organic demand. This market gap hurts U.S. farmers and it is crucial that we invest in organic research to support the domestic production of organic crops. Farmers need a bigger investment in public organic agricultural research. Organic research is a win-win for 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. Research dollars for conventional agriculture and organic agriculture are out of balance.*

*The bipartisan Organic Agriculture Research Act (H.R.2436/S.2404) has been introduced in the House and Senate to authorize \$50 million in mandatory funding annually for the Organic Agriculture Research and Extension Initiative (OREI). Funding for OREI has been stagnant at \$20 million since fiscal year 2010, while many of the production challenges of organic farmers go unaddressed.*

##### **PROPOSED POSITION:**

OFA SUPPORTS increasing funding of federal organic agricultural production research to at least the same percentage represented by retail organic sales within the US marketplace.

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##### **PROPOSED POSITION:**

OFA SUPPORTS passage of the Organic Agriculture Research Act (HR2436/ S2404).

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

### **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. 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.

#### **PROPOSED POSITION:**

OFA OPPOSES any efforts to reduce the authority and role of the National Organic Standards Board (NOSB) in the overall standard-setting process, or to seek statutory changes to the delicate balance of stakeholder slot allocations for the Board membership.

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## 7. Organic Livestock and Poultry Practices Rule (OLPP)

### **Organic Livestock and Poultry Practices Rule (OLPP)**

*The Organic Livestock and Poultry Practices Rule (OLPP) or "animal welfare rule" would have allowed 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 withdrew the rule in May 2018.*

#### **PROPOSED POSITION:**

OFA SUPPORTS animal welfare requirements as proposed in the Organic Livestock and Poultry Practices Rule (as withdrawn 2018).

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## 8. Crop Insurance

### **Crop Insurance**

*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.*

#### **PROPOSED POSITION:**

OFA SUPPORTS equitable and fair-market insurance programs that are accessible and relevant for all sectors of diversified organic (and transition-to-organic) producers.

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**PROPOSED 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.

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**PROPOSED POSITION:**

OFA SUPPORTS allowing 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

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**PROPOSED 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. Raise the cap to 50% on increased production value under the expansion provision.

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**PROPOSED 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.

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**PROPOSED 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 midsize dairy operations.

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9. Food Safety Modernization Act

**Food Safety Modernization Act**

*The FDA Food Safety Modernization Act (FSMA) was signed into law by President Obama on January 4, 2011. It aims to ensure the U.S. food supply is safe by shifting the focus of federal regulators from responding to contamination to preventing it.*

**PROPOSED POSITION:**

OFA supports improvements to the Food Safety Modernization Act, providing science based and practical guidelines that are in line with organic practices and standards.

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## 10. Beginning Farmer & Rancher Development Program (BFRDP) Organic Priority Funding

### 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.*

*Many new farmers 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. Many beginning farmers chose to farm using organic methods and need specified technical assistance to enter this growing consumer market.*

#### **PROPOSED POSITION:**

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

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## 11. Organic Market Growth

### Organic Market Growth

*U.S. consumers are demanding more organic food, and they have proven this desire by growing the U.S. organic market by at least 10 percent annually since the inception of federal organic standards in 2002.*

*In 2017, U.S. organic sales reached \$47 billion (exceeding 5% of the total food sales in America) with over 17,500 U.S. certified organic farmers and 7,500 processors.*

*The organic market has helped preserve family farms across the country, paying farmers up to two to five times what they make under conventional agriculture. However, domestic organic production is not keeping pace with demand—we simply do not have enough certified organic farmers in the United States, and thus organic imports are filling the gap.*

*Less than 1 percent of U.S. farmland is certified organic and thus, U.S. farmers are losing opportunities to fill this consumer demand locally. Many conventional farmers are looking for alternatives to help them survive in agriculture but do not know how to start with the transition to organic.*

#### **PROPOSED POSITION:**

OFA SUPPORTS targeted outreach, training, information and technical assistance on organic farming systems, USDA organic certification and transition, and organic market development to historically under-served, minority and beginning farmers through USDA agency programs, land-grant institutions, and NGOs.

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

### **Natural Resource Conservation Service (NRCS) Programs: EQIP, CSP, CRP Programs for Extended Organic Support**

*USDA 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.*

#### **PROPOSED POSITION:**

OFA SUPPORTS raising the six-year payment limit from \$80K to \$450K under the Organic Initiative within the Environmental Quality Incentive Program (EQIP) making these payments equal to the rest of the EQIP program, and thereby ensuring full opportunity for organic farmers to participate in the program.

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#### **PROPOSED 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.

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#### **PROPOSED POSITION:**

OFA SUPPORTS reform of Conservation Reserve Program (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).

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## 13. Public Seeds & Breeds Research Funding

### **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.*

#### **PROPOSED 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 excluded from the Plant Protection Act.

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## 14. Organic Production Market and Data Initiatives (ODI)

### **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.*

#### **PROPOSED POSITION:**

OFA SUPPORTS reauthorization of the Organic Data Initiative (ODI) 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.

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## 15. Organic Liaison at USDA

### **Organic Liaison at USDA**

*From 2010 – 2014, the USDA funded a position titled: Organic and Sustainable Agriculture Policy Adviser, which coordinated organic issues across different USDA agencies under the Secretary of Agriculture. This position was helpful in coordinating organic farming policy issues across agencies and assisting with the “Know Your Farmer, Know Your Food” initiative.*

#### **PROPOSED POSITION:**

OFA SUPPORTS funding and filling the Organic and Sustainable Agriculture Policy Advisory staff position to serve as a communications link between the National Organic Program (NOP) 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 and what the National Organic Program (NOP) does and why it is important to the other goals of USDA.

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