

ORGANIC VOICE



ORGANIC FARMERS ASSOCIATION

NO. 2 • JUN 2021



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Photo Credit: David Benthall



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ASSOCIATION**

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President's Letter



For northern US growers I hope your season is off to a good start, for the southern and western growers here's to a good summer season. Here in Maine this spring we are experiencing what for us is a lower-than-normal amount of rainfall. Of course, you would not know it from the green fields and trees budding out. It has been a warm spring with few nights of below freezing, which is unusual for us.

The weather has always fluctuated, and farmers love to complain about it, but the extremes seem to be normal now. As the USDA and Congress grapple with what to do about climate change OFA has voiced concerns about how programs or market solutions (carbon payments) will affect organic producers. Generally, we are concerned about how carbon in the soil will be measured and how that measurement relates to other aspects of soil health. Many organic farmers are already utilizing USDA programs that pay for practices rather than amounts of carbon, OFA supports continuing this process of payments coupled with technical support. Related to this is our concern about farmers who are "early adopters" not receiving credit for the soil building they have already done. Years and often decades of soil building through organic farming practice should be recognized for the value it has produced and not just a "take it from here" approach. Finally, we support more research into how carbon can best be stored in the soil while enhancing soil health, which is the objective of organic farming.

On another front, OFA continues to be frustrated by the lack of movement at the National Organic Program to control the fraud within the organic marketplace. We hope to see several organic rules which started as NOSB recommendations and have now reached the finish line go into the regulations: The Origin of Livestock Rule, the Strengthening Organic Enforcement Rule and the Livestock and Poultry Practices Rule to name a few. While creating these new regulations may help to control the abuse in the Organic Program, OFA believes that the NOP has all the authority it needs now to deal with these

problems and support the many Certified Organic Farmers who follow the rules.

To reinvigorate the National Organic Standards Board and the National Organic Program, OFA has signed on to a broad coalition of Organic Organizational partners to put pressure on the USDA to finalize the more than twenty years of outstanding NOSB recommendations. Many of these recommendations are necessary to bring consistency and uniformity to the national organic program, and without them, certifiers are left to develop their own standards like in Mushroom, Kelp, and Greenhouse Production systems for example. Without NOP standards, we do not have uniformity and that can create regulatory loopholes that hurt small and mid-size farmers. We are hopeful this administration will prioritize working through the regulatory backlog so we can focus on the future.

Organic farmers have a stronger voice when we work together. That is why we created Organic Farmers Association. Join, encourage your colleagues and customers to join, and help us move organic forward with farmers at the heart of the movement.

OrganicFarmersAssociation.org

Sincerely,

A handwritten signature in cursive script that reads "David Colson".

Dave Colson, President
New Leaf Farm, Durham, Maine



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SPRING LEGISLATIVE UPDATE

By, Patty Lovera, Policy Director

CLIMATE CHANGE LEGISLATION

At long last, Congress and the USDA are devoting significant time to the critical topic of climate change. This spring, there have been multiple hearings in the House and Senate Agriculture Committees on the topic, discussions and comment periods for the USDA and lots of public debate about the role of agriculture in contributing to the problem and potentially helping to address it.

In late April, OFA submitted a detailed comment and a petition signed by over 1000 people to the USDA about the department's strategy on the climate crisis. We emphasized the need for high integrity in the organic standards, especially upgrading rules and enforcement to make sure organic livestock are raised in high welfare pasture-based systems and making sure soil is the foundation of organic production.

In late May, the USDA released an initial “progress report” about its priorities and plans for moving forward on climate and agriculture, focusing on research, leveraging existing conservation programs and developing methods to quantify the impact of “climate-smart” agriculture practices.

As we enter the summer, the debate about climate and agriculture is going to continue because of the push by President Biden to pass an infrastructure package – several bills related to agriculture and climate have been introduced in hopes that some pieces of those bills will be included in an infrastructure package passed by Congress later this summer. A big focus for many members of the House and Senate Agriculture committees will be increasing the money included in an infrastructure package for USDA conservation programs, so that these programs can help more farms adopt climate-friendly practices.



AGRICULTURAL RESILIENCE ACT



House sponsor – Rep. Chellie Pingree (D-ME);
Senate sponsor – Sen. Martin Heinrich (D-NM).
This bill we feel best supports organic farmers' interests by focusing on six concrete policy areas to advance farmer-driven methods to address climate change:

1. Increase Agriculture Research to Prioritize Climate Change
2. Support Programs for Improving Soil Health
3. Protect Existing Farmland
4. Support Pasture-based Livestock Systems
5. Boost Investments in On-farm Energy
6. Reduce Food Waste.

CLIMATE STEWARDSHIP ACT



House sponsor – Rep. Abigail Spanberger (D-VA);
Senate sponsor – Sen. Cory Booker (D-NJ). This bill is focused on voluntary farm and ranch conservation practices, massive reforestation, and wetlands restoration. The bill would support voluntary climate stewardship practices on more than 100 million acres of farmland, plant billions of trees to revive deforested landscapes and expand urban tree cover, reestablish the Civilian Conservation Corps, restore over two million

acres of coastal wetlands, and invest in renewable energy for farmers and rural small businesses.

Another approach to climate change and agriculture is much more controversial – the idea of using the potential to hold carbon in soil as an offset for greenhouse gas emissions through a carbon payment system. There is a lot of debate about the best way for farmers to participate in private carbon market programs, some of which are starting to pay some farms based on complex models of how much carbon they could be sequestering in their soil, or based on the practices the farm is using. There is also debate about whether or not the USDA should play a role in these markets, either by providing some oversight of private programs and assistance for farmers who want to enter a private carbon market, or even whether the USDA should set up its own “carbon bank” that would serve as the middleman between a farm generating credits and a greenhouse gas-emitting industry that wants to buy them. The debate over public or private carbon markets has been intense. There are big questions that need to be answered about how feasible it is to actually verify whether farms are capturing (and holding on to) carbon in their soil, whether the cost of testing or other verification requirements will be covered by the price of credits and whether small, organic and diversified farms will be able to participate. And then there’s the question of “early adopters,” those farms that may have sequestered carbon many years ago but because their soils are closer to saturation may not show big increases in future years. How to fairly compensate these farms is a nagging uncertainty for carbon market proponents.

OFA is tracking and injecting the perspective of organic farmers in the debate over both carbon markets and trying to leverage existing conservation and research programs to address climate change. There will be lots more to report by the fall.

**CLICK TO TAKE ACTION
ON CLIMATE CHANGE**

PUSHING USDA TO STRENGTHEN ORGANIC INTEGRITY

Certified organic farmers rely on the “USDA Organic” label to accurately convey information about their products in the marketplace. Because consumers believe in the integrity of the organic label, the organic sector has enjoyed tremendous growth and provided a path to economic viability for many family farms. But delays in updating the standards and lack of enforcement by the USDA’s National Organic Program have led to rising frustration in the organic community, including from organic farmers who rank increasing the integrity of the organic standards at the top of the list of OFA’s policy priorities year after year.

Several critical rulemakings remain stuck inside the USDA, including updates to the Origin of Livestock rule, reinstating the Organic Livestock and Poultry Practices rule, and finishing the Strengthening Organic Enforcement rule. This spring, pressure on the NOP to pick up the pace on updating the organic standards came from several directions.

On Earth Day, Francis Thicke, a former member of the NOSB and OFA’s first Policy Committee Chair, wrote [an open letter](#), signed by 42 other



former NOSB board members, to the Secretary of Agriculture Tom Vilsack. The letter expressed their “concern that the integrity of the National Organic Standards has eroded significantly over the years” and that the “erosion of the Organic Standards is in violation of the Organic Foods Production Act of

1990 and is undermining consumer confidence in the integrity of organic food and the confidence of real organic farmers in the integrity of the USDA National Organic Program.”

A week later, at the close of the spring meeting of the National Organic Standards Board meeting, board chair Steve Ela, an organic farmer from Colorado, made a point of saying that the board was excited to see a new bill in Congress to address the backlog of NOSB recommendations that the USDA has not moved into regulations. The bill, the Continuous Improvement and Accountability in Organic Standards Act, was introduced by Representatives Peter DeFazio (D-OR), Rodney Davis (R-IL), Chellie Pingree (D-ME), Jimmy Panetta (D-CA), Dan Newhouse (R-WA) and Ron Kind (D-WI). The legislation would require the USDA to advance and implement recommendations from the organic industry in a timely manner and to ensure the continuous improvement of organic standards. OFA has endorsed this bill.

CONTINUOUS IMPROVEMENT BILL

The bill would create three pathways to create continuous improvement in the organic standards:

- The bill **requires USDA to issue an Organic Improvement Action Plan** to address the backlog of recommendations by the NOSB that have not been implemented. The plan must include detailed timelines, prioritization, and implementation plans for dealing with each recommendation.
- When the NOSB passes a recommendation that is supported by the majority of the board, the bill **requires USDA to issue a final rule implementing the recommendation within two years**.
- The bill **requires USDA to report annually to Congress** on whether accredited third-party certifiers have implemented new rules and guidance, and identify any inconsistencies found.

THE USDA NOP BACKLOG

STRENGTHENING THE ORGANIC SEED GUIDANCE
EXCLUDED METHODS DETERMINATION
INSPECTOR QUALIFICATIONS
ELIMINATING THE INCENTIVE TO CONVERT NATIVE ECOSYSTEMS
CLARIFYING "EMERGENCY" FOR USE OF SYNTHETIC
PARASITICIDES IN ORGANIC LIVESTOCK PRODUCTION
RESEARCH PRIORITIES
EXCLUDED OPERATIONS IN THE SUPPLY CHAIN (UNCERTIFIED
HANDLERS)
PROHIBIT AEROPONICS PRODUCTION
EXCLUDED METHODS TERMINOLOGY
PREVENTION STRATEGY GUIDANCE FOR EXCLUDED METHODS
LIVESTOCK VACCINES MADE WITH EXCLUDED METHODS
CLARIFICATION AND GUIDANCE ON RETAIL COMPLIANCE AND
CERTIFICATION
CALCULATING PERCENTAGE ORGANIC IN MULTI-INGREDIENT
PRODUCTS
INSPECTOR QUALIFICATIONS
ANIMAL HANDLING AND TRANSPORT TO SLAUGHTER
ANIMAL WELFARE AND STOCKING RATES
APICULTURE
INERTS
PRODUCTION STANDARDS FOR TERRESTRIAL PLANTS IN
CONTAINERS AND ENCLOSURES
ANIMAL WELFARE
MOLLUSCAN SHELLFISH (BIVALVES)
AQUACULTURE: FISH FEED - FISH OIL AND FISH MEAL
CERTIFYING OPERATIONS WITH MULTIPLE PRODUCTION UNITS,
SITES, AND FACILITIES
ORGANIC PET FOOD STANDARDS
FARMED AQUATIC PLANTS IN ORGANIC AGRICULTURE
FINAL RECOMMENDATION ON AQUACULTURE
ORIGIN OF LIVESTOCK RULE CHANGE
CLARIFICATION ON POULTRY ACCESS TO OUTDOORS
APICULTURE STANDARDS
MUSHROOM PRACTICE STANDARD

OFA will continue to push the NOP to make progress on the backlog of updates to the organic standards and increase its enforcement efforts. Growing the list of members of Congress who support this bill is one more way to show the NOP the urgency of addressing the integrity of the organic label. 🌱

Patty Lovera is Policy Director of Organic Farmers Association. She makes sure that the policy priorities of certified organic farmers are represented in Washington, D.C.



UPDATE & ACTION FOR ORIGIN OF LIVESTOCK RULE

Since 2013, the organic community has been working to fix a loophole in the Origin of Livestock rule for organic cow dairies. The USDA National Organic Program's failure to strengthen the standards for organic livestock has allowed large-scale organic dairies to undermine those organic farms that comply with the intent of the organic label.

In 2015, the NOP published a proposed rule to clarify that, after completion of a one-time transition from a conventional dairy farm, all new dairy animals milked on an organic dairy farm would need to be managed organically from the last third of gestation. The 2015 proposed rule garnered strong public support from the entire organic community but has never been finalized. Now, after years of advocacy by the organic community, the NOP has released another revised proposed rule for public comment.

Years of delay have caused ongoing economic harm to organic dairy farms. OFA is pressing the NOP to finalize this important rulemaking as quickly as possible with a final rule that can be consistently enforced and that prohibits cycling dairy animals in and out of organic production. We will also urge the NOP to not allow the sale or transfer of transitioned animals as organic.

Please join OFA's petition to tell the NOP to level the playing field for organic dairy farmers by closing loopholes in the rule for transitioning livestock to organic. THE DEADLINE IS JULY 12th.

CLICK TO READ & SIGN
OFA's PETITION ON
ORIGIN OF LIVESTOCK

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CONVENTIONAL NO-TILL? NO WAY! ORGANIC SYSTEMS SEE BETTER NO-TILL RESULTS

Rodale Institute's longtime comparison study of organic and conventional grain production systems shows that when no-till was introduced to both organic and conventional systems, its benefits were only seen in organic systems.

WRITTEN BY:
DR. YICHAO RUI, RODALE INSTITUTE

No-till management is gaining popularity in farming communities as a method to reduce labor and soil disturbance, which can impact soil health. Conventional farmers spray their cover crops in the spring with herbicides before planting, but since herbicides are not in the

toolbox for organic farmers, no-till farming is more complex for organic farmers. Rodale Institute has been committed to providing solutions to reduce tillage in organic systems to build soil health and create more effective, efficient, and regenerative farming systems. Recent research

data from the 40-year-old Farming Systems Trial comparing organic and conventional grain production systems shows that when no-till was introduced to both organic and conventional systems, its benefits were only seen in organic systems. In conventional systems, no-till resulted in more severe compaction and more herbicide-resistant weeds.

TO TILL OR NOT TO TILL?

For decades, intensive use of tillage was a key characteristic of industrial agriculture. Soil erosion and oxidative loss of organic matter as a result of frequent tillage has been a major factor in many environmental catastrophes, such as the Dust Bowl of the 1930s. Even today, soil erosion continues to threaten our food system. Reducing tillage has become an urgent need in agricultural systems.

In the last two decades, progress on tillage reduction has been made in both organic and conventional systems, but in completely different ways. The combined use of

herbicides and GMO seeds such as Roundup-ready corn and soybeans has allowed more conventional farmers to adopt no-till. In Pennsylvania, approximately 70% of conventional grain farmers were no-till in 2020. Many organic farmers are still relying on tillage to prepare a seedbed and/or cultivate to control weeds, but the recent development of organic no-till systems has shown its potential to be widely adopted and to refine organic systems.

Rodale Institute has been developing and refining the cover crop-based organic rotational no-till systems since the 1990s. In these systems, annual cover crops are planted in the fall and terminated in the spring by innovative tools such as the roller-crimper. Cash crops are planted into the rolled cover crop residues, which will become a weed-suppressing mulch in the growing season. In 2008, this organic no-till system was introduced to the Farming Systems Trial (FST) at Rodale Institute. Established in 1981, FST is the longest-running side-by-side comparison of organic and conventional grain production systems in North America (Figure 1A). Forty years of data show that diversified, well-managed organic systems produce competitive yields relative to the conventional system. Soil organic matter increased significantly in both manure and legume organic systems but remained largely unchanged in the conventional system (Figure 1B).

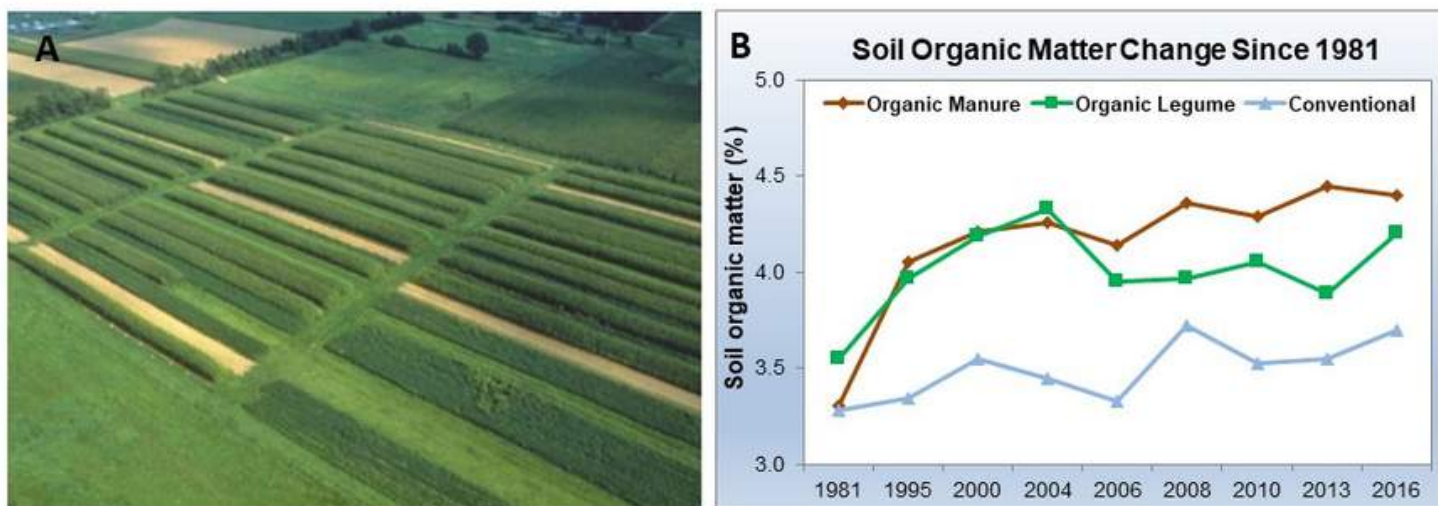
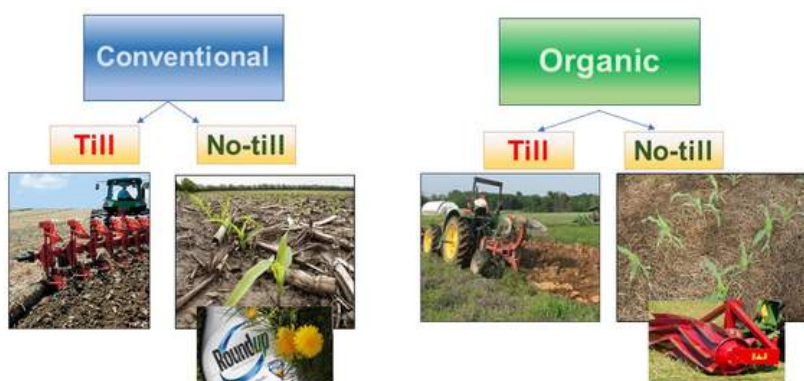


Figure 1. (A) The Farming Systems Trial (FST) at Rodale Institute in Kutztown, PA, est. 1981, the longest-running side-by-side experimental comparison of organic and conventional grain cropping systems in North America.

(B) Soil organic matter (%) change in conventional, organic legume and organic manure systems in the Farming Systems Trial since 1981.



"...the no-till organic manure system showed the highest soil health score, while the no-till conventional plus cover crop system had the lowest soil health score."

Figure 2. In 2008, all management systems of the Farming Systems Trial (FST) were divided into till and no-till. No-till was achieved by herbicides and GMO seeds in the conventional system, and by adopting the "cover crop-based organic no-till" in organic systems.

In 2008, both conventional and organic systems were divided into "till" and "no-till". This management change provided an opportunity to assess the long-term impacts of reducing tillage in organic and conventional systems (Figure 2).

COMPOUNDING BENEFITS: ORGANIC NO-TILL

In 2019, Rodale Institute partnered with Soil Health Institute in the North America Project to Evaluate Soil Health Measurement (NAPESHM) project. Soil samples were taken by researchers of the two organizations and analyzed in multiple labs. Results show that after over a decade of "no-till" vs. "till" split, no-till management enhanced soil organic matter content in organic systems, but decreased it in the conventional system, compared to the tillage treatment (Figure 3A). Adding a cover crop seems to benefit soil organic matter in the tilled conventional system, but not the no-till conventional system. Based on the Cornell Comprehensive Assessment of Soil Health (CASH), the no-till organic manure system showed the highest soil health score, while the no-till conventional plus cover crop system had the lowest soil health score (Figure 3B).

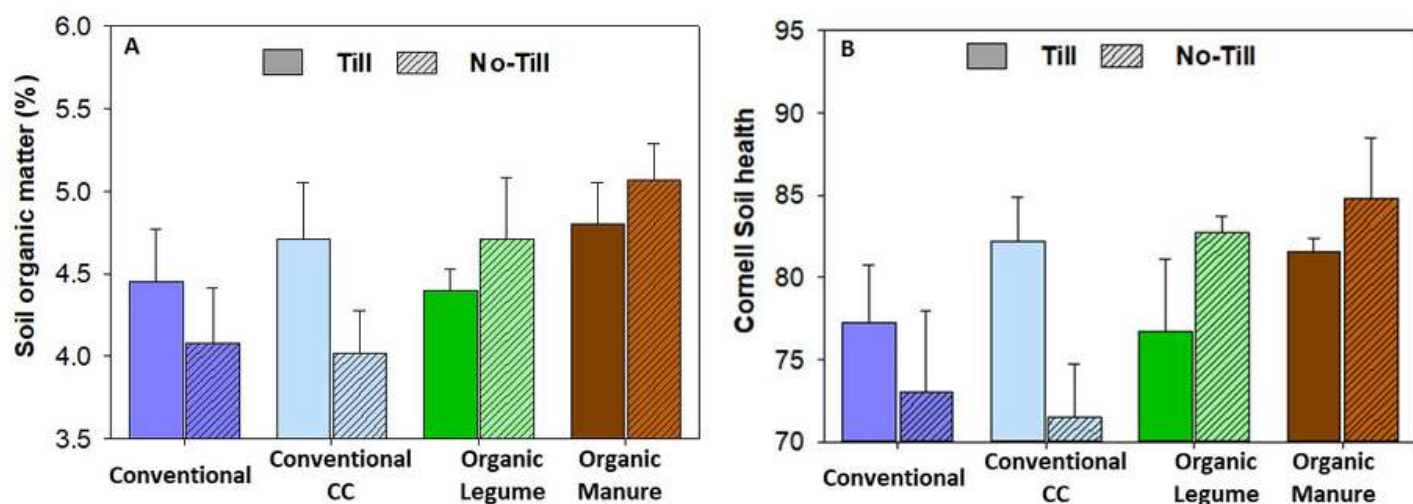


Figure 3. (A) Soil organic matter (%) **(B)** Soil health score based on the Cornell Comprehensive Assessment of Soil Health (CASH) rating system of conventional, conventional plus cover crop (conventional CC), organic legume, and organic manure systems of the Farming Systems Trial (FST) at Rodale Institute.

HOW DOES NO-TILL AFFECT THE TWO SYSTEMS DIFFERENTLY?

Identifying the reason why no-till did not improve soil organic matter in conventional no-till systems (even when cover crops were used) can be complicated.

No-till in chemical-heavy systems can cause severe compaction, which may further limit the microbial activity due to constrained soil pore structure. Although in many instances, no-till management reduces soil disturbance and oxidative loss of soil organic matter, if there is not an adequate amount of carbon returned to the soil, either from plant roots or amendments (as is often the case in conventional corn and soybean systems) the soil may actually become a carbon source.

Conversely, periodic use of tillage in conventional systems may incorporate crop residues, therefore providing a carbon source to soil microbes and building soil organic matter. We are increasingly discovering that the formation of soil organic matter is a result of the stabilization of dead microbial biomass in soil, which explains some of why soil organic matter can be higher in tilled than no-till conventional systems.

In organic systems, however, the systems usually have much more diverse carbon inputs going into the soil, so the microbial growth and biomass production are always greater than conventional systems. Adoption of no-till in organic systems can further increase carbon content by protecting the accumulated soil organic matter from loss due to soil disturbance.

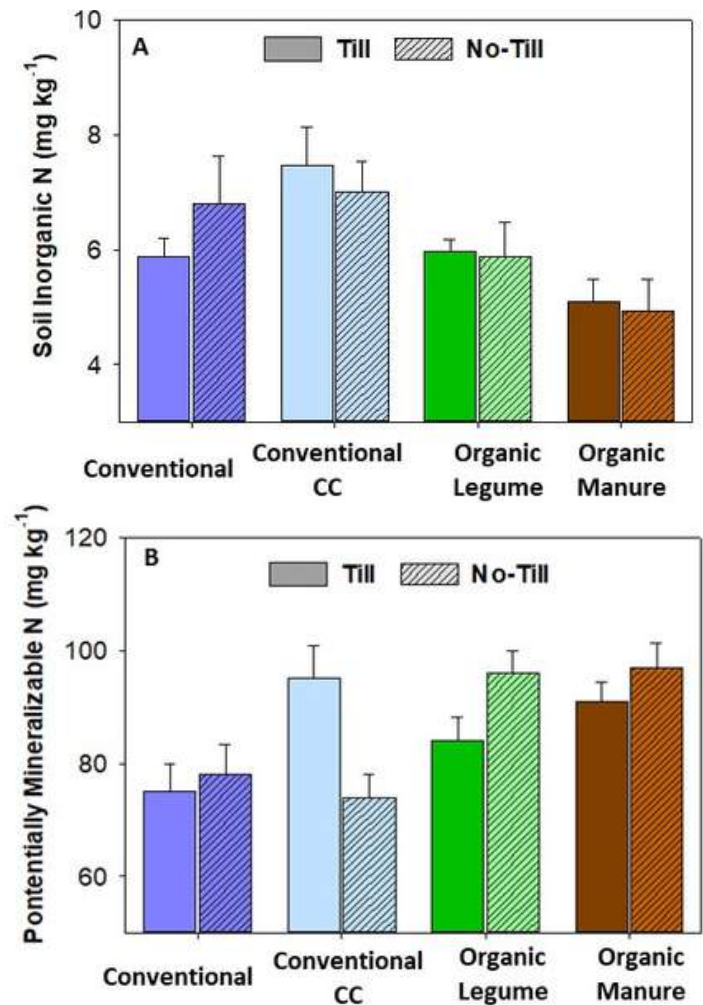


Figure 4. (A) Soil inorganic nitrogen content (mg kg⁻¹) **(B)** Soil potentially mineralizable nitrogen content (mg kg⁻¹) of conventional, conventional plus cover crop (conventional CC), organic legume, and organic manure systems of the Farming Systems Trial (FST) at Rodale Institute.

NO-TILL ON SOIL NITROGEN

Besides soil organic matter and carbon stock, no-till also affected other soil health properties differently in organic and conventional systems. In the conventional systems, soil inorganic nitrogen (NH₄-N and NO₃-N) concentrations were greater (which indicated greater leaching potential). Adding cover crops in conventional systems (CNV CC) increased organic N in the conventional system, but only when tillage was used (Figure 4B), indicating that organic nitrogen availability was dependent on whether cover crop residues were incorporated or not.

Whereas, in the organic systems, no-till generally resulted in greater availability of organic nitrogen compared to tilled soils. Organic nitrogen that is readily available for plant use, namely the potentially mineralizable N (PMN), was greater in organic systems (Figure 4A,B).

In contrast to conventional crop production, organic production relies on biologically supplied organic amendments to provide nitrogen (e.g., animal manure, green manure, and leguminous cover crops). These organic materials provide more diverse and complex sources of nitrogen, which can encourage greater abundance and activity of N-cycling soil microbes, which in turn can increase overall nitrogen-use efficiency on organic farms and decrease nitrogen-related pollution. No-till tended to improve the PMN, but only in the organic systems.

"no-till can improve soil health, but its benefits may be more pronounced in organic, not conventional systems."

These findings suggest that the adoption of no-till can improve soil health, but its benefits may be more pronounced in organic, not conventional systems. In chemical-heavy conventional systems, no-till can cause more severe compaction and more herbicide-resistant weeds, therefore reducing its potential for soil carbon sequestration and causing more problems for farmers' long-term operations and our environment.




Freshly crimped rye cover crop on an organic no-till field.



Conventional no-till field after chemical herbicide application to cover crop.

NEXT RESEARCH STEPS

Rodale Institute recently received a grant from the USDA National Institute of Food and Agriculture (NIFA) to investigate the “Microbial contribution to building and stabilizing soil organic matter in agroecosystems.” In this project, Rodale Institute’s Pennsylvania research team will partner with University of Wisconsin-Madison and Iowa State University to compare the soil carbon

sequestration potential and its relationship with soil microbial community under different management systems, including comparing tillage and no-till in organic and conventional systems in long-term trials of these three states. With this research, we hope to continue to identify the soil health benefits of organic no-till in a variety of regions. 



Dr. Yichao Rui is the Research Director of the Farming Systems Trial at Rodale Institute and supports all other soil health-related research, education, and outreach at the Institute. Dr. Rui holds Ph.D. degrees in Microbial Ecology and Soil Science from the University of Chinese Academy of Sciences and Griffith University (Australia). Before joining Rodale Institute,

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**SPRING
MEETING
APRIL 2021**

NATIONAL ORGANIC STANDARDS BOARD

NOSB Spring Meeting Highlights for Organic Farmers

By, Harriet Behar

Numerous important discussions of interest to organic crop producers occurred during the virtual 2021 spring National Organic Standards Board (NOSB) meeting the last two weeks of April, including over 11 hours of public comment and 13 hours of Board discussion.

AMMONIA EXTRACT

Ammonia extract, considered a natural substance since this version is derived from manure, was petitioned to be placed on the prohibited non-synthetic list, with many comments both pro and con. Those wanting approval for this material point to the need for a highly soluble source of nitrogen to improve organic crop yields, as well as a way to deal with extreme climate issues such as very wet, cold or dry conditions when the soil biological activity is stifled and not providing sufficient nutrients to the crop. Those against this natural form of ammonia extract pointed to information which stated that soil biological activity can be damaged by this material. Since the natural and synthetic



forms cannot be distinguished in the soil, it could be difficult to determine fraudulent use of the synthetic version, which is not allowed under organic standards.

Many commenters felt the allowance of this highly soluble fertilizer will begin to change current organic methods which “feed the soil” to instead mimicking conventional agriculture’s method of “feeding the plant”. Carbon sequestration and improvement of soil organic matter were also mentioned as foundational principles of organic, which is not encouraged in an agricultural system that relies upon soluble fertilizers. The NOSB will continue this discussion and perhaps include a wider-

ranging proposal in the fall, that might look at many types of highly soluble fertility inputs. Possible annotations discussed for these nutrients included restricting them to either specific conditions or a maximum percentage of that specific nutrient provided by that fertility input within a crop season.

KASUGAMYCIN

Kasugamycin, an antibiotic to prevent fire blight in pear and apple trees, was petitioned to be allowed. The two antibiotics that had been allowed in the past, have been removed from the approved list for more than five years. Most of our organic trading partners around the world do not allow the use of antibiotics for this crop use. West coast fruit growers spoke mostly in favor of allowing this material, since the current methods of fire blight control are labor intensive and rely upon the use of copper and sulfur, both somewhat toxic materials. They stated other inputs such as a yeast-based product are somewhat experimental and not as reliable or easy to use as antibiotics to control the possibility of losing whole blocks of trees in an orchard when the climatic conditions during blossoming allows for rapid spread of fire blight. Commentors and NOSB members were concerned about antibiotic resistance by widespread use, as well as consumer expectations that antibiotics are not allowed in organic and should remain that way. **It is expected that this material will be voted upon at the fall NOSB meeting.**



PAPER POTS

A proposal for paper-based crop planting aids, including paper pots, was approved unanimously by the NOSB. The NOSB has been reviewing and modifying this proposal for a couple of years since the paper's ingredients such as synthetic adhesives and non-biodegradable fibers made the wording of the proposal more complicated. In the proposed definition, at least 60% of the fiber must be cellulose-based and 60% of all of the ingredients must be non-synthetic. At least 80% of the content must be bio-based and verified by a third-party assessment. **Many small-scale growers using the chain paper pots will be happy to know that these pots meet this definition and will continue to be allowed in organic agriculture.**

BIODEGRADABLE BIOBASED MULCH FILM

Biodegradable biobased mulch film is another material that has not yet been finalized, with **an improved proposal coming back for review by the NOSB in the fall.** The current listing for this material requires 100% biobased ingredients, which are not available in the marketplace, other than a difficult-to-use paper mulch. The current biodegradable mulch films (not allowed in

National Organic Standards Board 2021



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WHAT IS THE NATIONAL ORGANIC STANDARDS BOARD?

The National Organic Standards Board (NOSB) is a Federal Advisory Board to the USDA National Organic Program (NOP). The 1990 law, the Organic Foods Production Act (OFPA), established the NOSB as an important component of the public-private partnership between the USDA NOP and the organic community. The NOSB is made up of 15 dedicated public volunteers representing the diversity of the organic community: 4 farmers, 2 handlers/ processors, 3 environmentalists/resource conservationists, 3 consumer/public interest advocates, 1 retailer, 1 scientist, and 1 organic certifying agent.

The NOSB has been meeting since 1992 and was active in developing the framework for the National Organic Standards and National Organic Program at USDA. The NOSB considers and makes recommendations on a wide range of issues

involving the production, handling, and processing of organic products. The NOSB has statutory powers over the National List of Allowed and Prohibited Substances.

Each NOSB member is appointed by the U.S. Secretary of Agriculture for a term of one to five years. USDA publishes a call for nominations each Spring, and newly appointed members begin service in January of the following year.

The NOSB meets twice a year at a public meeting, typically in April and October, to discuss the items on its work agenda, vote on proposals, and make recommendations to the Secretary. These meetings invite public input via advance written and virtual and in-person oral comments. All meetings are free and open to the public.

If an NOSB proposal receives a decisive vote (2/3 majority) by Board members in favor of the proposed motion, it becomes a recommendation to the USDA Secretary and the NOP.

organic) have 70% or higher content derived from petroleum, with some of these stretchable mulch films produced through genetically engineered bacteria. Those in favor of this material point to the environmental problem caused by tons of plastic mulches that end up in landfills, and the lack of recycling opportunities that would be solved by the use of biodegradable plastic films. Having an easy to install, non-removable mulch with the many heat producing, moisture conserving and weed prevention positive characteristics of these biodegradable mulch films, would be very popular with all types of growers. Those having concerns point to the uneven biodegradability of the mulches and that they need to be incorporated into the soil to break down. Pieces of mulch can blow into field edges or even waterways, causing problems for wildlife and the environment. The remnants of microplastics in the soil, and effect on soil biological life by continued use were also discussed. Many commenters felt there is not quite enough research completed on this material to change the annotation and allow for widespread use in organic agriculture.

HUMAN RESOURCES

Organic producers will also be affected by the discussion on how to improve the numbers of knowledgeable and experienced organic inspectors and certification agency personnel. As the organic regulations become more complicated and more entities are covered under USDA organic certification, the need for better trained and more numerous people working in organic certification has become clear. Discussion of partnering with colleges or universities to train certification personnel, as well as having experienced inspectors formally mentor novices for at least a year, were discussed. **The National Organic Program has asked the NOSB to work on this topic and within a week of the meeting, put out a request for proposals from non-profits to request funding for a variety of capacity building projects.**

Many other topics were discussed in livestock, handling and crops. The fall 2021 NOSB meeting in Sacramento, CA is planned to be in-person, where many of the materials reviewed every five years on the National List will be voted upon as well as any updated proposals. 🌱

NOSB 2021 FALL MEETING

Public Comment Webinars

Tuesday, October 12 @ 12-5 pm Eastern

Thursday, October 14 @ 12-5 pm Eastern

NOSB Public Meeting in Sacramento, CA

October 19 - 21 from Noon - 5:00 pm Pacific

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Harriet Behar runs organic Sweet Springs Farm in Gays Mills, Wisconsin, producing bedding plants, fresh and dried herbs, vegetables, grains, eggs and honey. Harriet serves on the Organic Farmers Association Governing Council and Policy Committee and has been involved with federal, state and local policy advocacy for over 30 years. Harriet recently served as Chair of the National Organic Standards Board. She has been an organic inspector since 1992 and has visited more than 2200 organic farms and processing facilities around the world.



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ORGANIC HYDROPONICS DEBATES

WHERE HAVE THEY BEEN AND WHERE MIGHT THEY GO?

By, Becky Weed, Thirteen Mile Farm

In 2010, the National Organic Standards Board (NOSB) recommended against allowing the organic certification of hydroponics. In 2014, the National Organic Program (NOP) officially permitted it, essentially ignoring the NOSB. Reaction to that discrepancy has variously festered, shuffled, and raged ever since. After more than 10 years of debate, the vast majority of OFA members consider this to be a high-priority issue. Over the same 10 years, the hydroponics industry has grown to be a \$1+ billion industry. It's time for distillation of the issues; an update on actions and arguments since 2010 that may inform choices; a look at why the debates still matter; and a plan.



Not all hydroponic production is grown indoors in water. An increasing amount of hydroponic production, especially for berries, happens outside on acres of plastic-covered soil covered in plastic containers where plants are fed all their nutrients via an aqueous solution.

THE ISSUES

Reasons for opposing the organic certification of hydroponics are compelling, heartfelt, and diverse. What follows is an analysis of the major reasons for keeping hydroponics out of organics, from the point of view of organic farmers who also eat and, in essence, sustain the regulators of the NOP by choosing to seek certification.

SOIL

The primary, foundational reason for excluding hydroponics from organics, is that farming without soil cannot fully encompass the principles of organic farming, and cannot yield the same outcomes as soil-based farming. The organic management of soils is a perpetual effort to improve soil health as well as the health of the crops and biological communities that soil hosts and interacts with. The traditional language of organic farming's founders and subsequent practitioners as well as the language of the NOP have framed this using terms like fertility, moisture storage, microflora, and parent materials. Collectively these traits also connect the soil to the broader farm environment—its water, biodiversity, susceptibility to erosion, and neighbors. At both small and large scales, these traits have been at the heart of organic

This spring, OFA farm members passed this position directing our work in this issue:

OFA SUPPORTS organic certification of crop production where typical terrestrial plants are grown to maturity in the ground with no barriers between the topsoil, subsoil and bedrock. The plants must obtain the majority of their nutrients from that soil rather than from highly soluble fertilizers. OFA OPPOSES organic certification of hydroponic production and other production systems which do not meet the preceding requirement and URGES the NOP to revoke the organic certification of such operations.

requirements and inspections for certified organic farms. Historically and to this day, some farmers frame this collection of traits in visceral, or even religious terms: “growing in soil is the way God intended farming to be.” Some farmers may not be inclined to use that language in an argument with a regulator, but nevertheless humbly and vocally embrace the complexity of soil, and grasp that we (both farmers and scientists) cannot fully disentangle the variables and thereby mimic the effects of soil by engineering an aqueous system.

NUTRITIONAL QUALITIES OF FOOD

The second major reason for excluding hydroponics from organics is that soil, and its interactions, drives nutrient density. It is difficult to enter the scientific literature on soil, crops, livestock, or human health these days, without encountering the burgeoning research on the microbiome—in all of those settings. In contemporary scientific terms, this means that considerations of crop and weed diversity, interacting

roots and microbial communities, phytochemical signaling sometimes mediated by microbes, biochemical resilience enhanced by the cation exchange capacity of soils, and subtle micronutrients made available by mineral-microbe interactions, etc. are all relevant to crop growth and nutritional content. Do organic farmers claim to fully understand all this? No one does, but our understanding is growing increasingly sophisticated. It is telling us that **our grandmothers' assessment that we are what we eat still holds, whether we are a tomato or a child.** It defies logic that an engineered aqueous system injecting a set of selected chemicals in a simplified environment is growing nutritionally equivalent food, despite substantial similarities in appearance and composition.

HARMONIZATION AMONG INTERNATIONAL CERTIFIERS

Europe, Canada, Mexico and IFOAM (International Federation of Organic Agriculture Movements) all exclude hydroponics from organic certification, based on the premise that soil is fundamental to organic farming, by definition. By certifying hydroponics operations, the NOP has created a contradictory standard for U.S. farmers without an adequate rationale.

INCONSISTENT ORGANIC U.S. CERTIFICATION

Not only is the NOP inconsistent with the international norms on hydroponic prohibition, but its standards are also inconsistent and ambiguous within the U. S. In 2014, when the NOP officially announced that hydroponic operations could be certified, a small but growing contingent of farmers began to ask, “if the NOP is certifying various containerized hydroponic production technologies in greenhouses and elsewhere, what does that look like, and how are they translating a soil-based standard to these engineered aqueous schemes?”

Farmers who had been rallying and writing in opposition to the USDA directive based on their knowledge of and passion for soil-based farming, expanded their muckraking to include questions about land transition requirements for containerized growing regimes. The ambiguities they uncovered led to a USDA memo in June 2019 that tried and failed, to provide written clarification. This in turn led to OFA collaborating with National Organic Coalition and Accredited Certifiers Association, Inc. to conduct a “Three-Year Transition Survey,” questioning 34 certifiers on the protocols for how they determine whether a three-year transition after the application of a prohibited substance is needed for a wide array of production technologies. The survey clearly demonstrated that transition requirements for dozens of growing scenarios, remain ambiguous and inconsistently certified across this country. In response, the ACA working group of 22 members from 18 accredited certifiers met to remedy this inconsistency with guidance but could not agree without NOP clarification.

If failure to address the imperative for clarity and consistency was merely due to bureaucratic oversights and missteps, we could clean up the flaws and move on. We find ourselves asking instead, is the drive to certify hydroponics as organic a misguided effort to drive a square peg into a round hole—to the detriment of the entire organic framework?



Seth Kroeck, Farm Manager at Crystal Spring Farm in Brunswick, Maine has been growing vegetables organically for 20 years. In 2014 Seth began organically managing 72 acres of wild blueberry barren next to his farm fields. They offer several unique blueberry products they market through local retailers. Seth explains, “We grow a native wild organic crop, nurtured in soil that has sustained these plants for millennia. The management of our blueberry fields has to look beyond the next year’s harvest to provide healthy plants that can sustain the next generation of growers who will take over after us. Knowing this, there is a fundamental disconnect when our blueberry products are displayed on grocery shelves next to hydroponically raised berries carrying the same USDA organic seal. Should experienced organic growers, committed to the long-term health of their soils compete against pop-up hydro-organic in what is presented as an apples-to-apples consumer choice?”

"We find ourselves asking instead, is the drive to certify hydroponics as organic a misguided effort to drive a square peg into a round hole—to the detriment of the entire organic framework?"



A BRIEF HISTORY OF HYDROPONICS & ORGANICS

Hydroponics has not always been allowed in organic certification. Here's a brief history of the controversy.

1995

NOSB recommendations on organic standards mention hydroponics, "Hydroponic production in soilless media to be labeled organically produced shall be allowed, if all provisions of the OFPA have been met."

2001

National Organic Standards were published. NOSB passes a recommendation on greenhouse standards. **A proposal to permit hydroponic in organic is defeated.**

2013

Without action from NOP on to codify greenhouse standards through rule-making, **hydroponic greenhouse production labeled as organic grows**, primarily imported from Mexico and Holland. Certifying agencies are divided on whether they will certify hydroponic production. **Farmers circulate petitions calling on the NOP to act on the 2010 NOSB recommendation.**

2015

NOP establishes the Hydroponics and Aquaponics Task Force, composed of majority hydroponic growers. Results in a divided report.

2017

NOSB failed to pass a recommendation to prohibit hydroponics. It failed to pass a recommendation to prohibit aquaponics. It did pass a recommendation to prohibit aeroponics. No reason was given why aeroponics should be prohibited while hydroponics should be allowed. **With the failure to pass a new recommendation, the 2010 recommendation continued as the standing NOSB recommendation to prohibit hydroponics.**

2019

The NOP issued a Memo that clarified some aspects of container production but also raised more questions. Center for Food Safety (CFS) petitions USDA to prohibit organic certification of hydroponic operations.

2021

Federal district court sides with USDA in the lawsuit brought by CFS and other plaintiffs, ruling that USDA's decision to exempt hydroponic operations from organic soil requirements is allowed because the OFPA did not specifically prohibit hydroponic operations.

1990

Congress passed the **Organic Food Production Act (OFPA)** and created the **National Organic Program (NOP)** and the **National Organic Standards Board (NOSB)** to guide USDA on how organic eligibility should be defined and how to implement OFPA. OFPA states, "An organic plan shall contain provisions designed to foster soil fertility, primarily through the management of the organic content of the soil through proper tillage, crop rotation, and manuring."

2010

NOSB passes another (more detailed) recommendation on greenhouse standards and **recommends USDA prohibit hydroponics from being certified organic.** USDA fails to move recommendations forward to rulemaking. Hydroponic greenhouse production labeled as organic is growing rapidly, primarily coming from Mexico and Holland (where it is not certifiable as organic). Certifying agencies are divided--some will certify hydro and some will not.

2014

NOP Director releases statement that hydroponic is allowed.

2016

USDA & NOSB receive **letter calling for a moratorium on new hydroponic certification**, signed by 41 organizations (representing over 2 million people) and 15 former NOSB members.

2018

The NOP released a statement that hydroponic production has always been allowed and will continue to be so. Many farmers and certification agencies disagreed with this statement and questioned the NOP's ability to make such a claim without substantiating the decision. **This lack of clarity and controversy has left a continued distrust of the NOP and inconsistent and unclear organic standards for organic farmers nationwide.**

2020

Center for Food Safety (CFS) (with other plaintiffs from the organic community) files a **lawsuit challenging USDA's decision to allow hydroponic operations to be certified as organic.**

AN UPDATE ON OTHER CONCERNS

While certified organic farmers oppose certification of hydroponics, we do not dismiss there are concerns within the organic community that need to be addressed, yet **we do not want to “water-down organics” as an easy solution to these systemic problems.**

EXPAND ORGANIC

An aspiration to “Expand Organics” is admirable, but not if we do so at the expense of a meaningful organic benchmark. Asserting that we must expand organics at all costs is not so different from the troubled history of conventional farming in which powerful forces have driven a single-minded metric of high yield--at the expense of soil, crop, livestock health, and farm profitability, and thus human well-being. Pandemic 2020 has put an exclamation point on that peril.

INCREASE ACCESS TO ORGANIC FOOD

The vibrant and important field of urban farming offers much promise for access to nutritious food and urban engagement in the vital role of farming in human society, but it is a false premise that this demands hydroponics' certification. The task of ensuring healthy clean soils at any scale in any setting is both a possible and vital aim of growing and learning about food. Indeed, this principle applies to any food desert, urban or rural.

LEGAL CHALLENGE OF USDA

The legal battle over organic hydroponics is not over. The Center for Food Safety (CFS) lawsuit filed in 2020 failed based on the judge's ruling that he did not have the standing to reverse USDA policy. This ruling was based on legal precedent regarding agency jurisdiction, not the content of the CFS argument regarding the primacy of soil.

TOO LATE TO CHANGE

Some are asserting that “it would not be fair” for the NOP to change its policy, now that a billion-dollar hydroponics industry has grown with the assistance of the 2014 NOP 'permission'. The irony of this claim is not lost on those in the NOSB and organic community who warned that hydroponics' certification was problematic at its inception, and would be challenged. Nor is it lost on the hundreds of soil-based organic and fruit and vegetable farmers whose livelihood is threatened (or already wrecked) by the tilted playing field that helps an industrial “organic” hydroponics industry to thrive under much less stringent standards.

THE ORGANIC LABEL IS VALUABLE

Some members of the organic community expressed concern that the hydroponics 'fight', by criticizing the entire USDA organic label, was inadvertently undermining organic producers not directly



Certified organic hydroponic berry production has grown tremendously over the past few years. Left: Organic blueberry hydroponic container production on an organic farm in California. Below: Hydroponic strawberry production.



vulnerable to hydroponic competition. This includes the small grains growers of the Great Plains and their food manufacturing partners, for example, as well as the diverse livestock-based organic sector, and others. Members and leadership of the Real Organic Project (ROP) listened to these concerns and clarified its language to differentiate between its critiques of the NOP and its respect for a wide array of farmers who have come to rely on its organic program.

ORGANIC INTEGRITY CUTS ACROSS COMMODITY


Loss of integrity in the organic standard in any sector threatens the integrity and reputation in all sectors. Anyone who doubts that all organic farmers and consumers have a stake in the fate of organic integrity need only look to the current issues revolving around fraudulent organic grain imports, delays and limitations in reforming animal welfare provisions by the NOP, and corporate adoption of the regenerative farming rhetoric without rigorous safeguards against greenwashing. We misinterpret internal debates at our own peril, and at the peril of an organic future for food and land. The ostensible “benefits” of pseudo-organic accrue only to those who live by quarterly reports. Natural systems are the ultimate arbiter.

Becky Weed has farmed for 30+ years at Thirteen Mile Farm, raising certified organic sheep for lamb and wool in southwestern Montana. Becky is current President of Montana Organic Association, which she represents as an organization leader on the OFA Governing Council.

WHAT YOU CAN DO

OFA continues to oppose organic certification of hydroponics because our organic farmer members continue to confirm it remains a top priority. We have worked for several years to urge the NOP to stop certifying new hydroponic operations and to revoke the organic certification of currently certified hydroponic systems. The standing NOSB recommendation to prohibit hydroponics was passed in 2010, and is one of the 20 NOSB recommendations that have been set aside by the USDA.

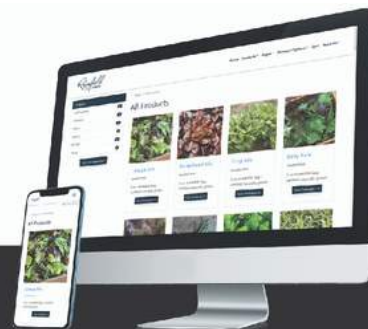
You can support our efforts by telling your members of Congress to put pressure on the USDA to move the backlog of NOSB recommendations, including the 2010 recommendation that prohibits hydroponics from being certified as organic, to rulemaking.

No matter what the outcome of the organic community’s collective efforts to hold the NOP to the organic benchmark, OFA will continue to work with farmers and consumers to educate and carry on the mission of advancing organic farming and food in supporting healthy communities and ecosystems. 





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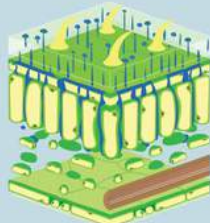
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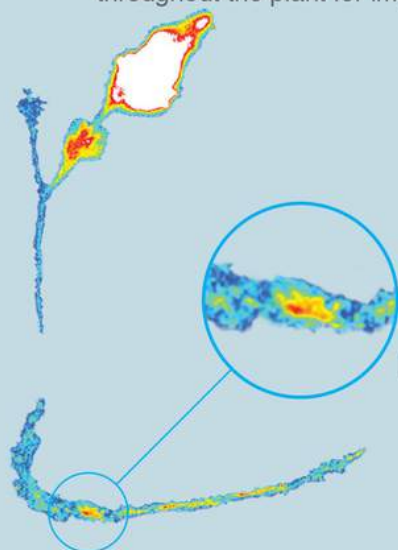
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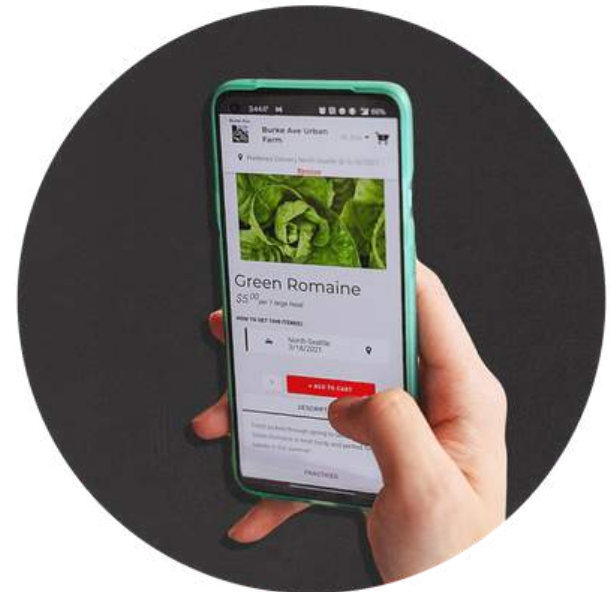
Insights From the Top 100 Farm Websites

Website Best Practices Organic Farmers Can Leverage to Increase Farm Profitability

Contributed by, Barn2Door

There is a difference between a live website and a website that attracts buyers and fuels Farm sales. Why? It only takes 6 seconds for a prospective buyer to form an opinion about your website. That opinion is often based on the design, navigation, and experience that will cause visitors to stay or leave.

OFA top-level sponsor, Barn2Door serves thousands of farms across all 50 states. Recently they analyzed and gathered data from the top 100 farm websites based on sales volume. Here are the tactics employed by the top farmers in the country that you can implement these best practices this season and improve your farm business sales.



CLEAN & CLEAR DESIGN

It's more important than ever for your farm website to reflect your brand - who you are, why you're farming, and how your customers can engage with you. Your site's design can make or break your success as your farm's credibility directly impacts sales conversion. **From a visual perspective, a website's look and feel should be simple, beautiful, and professional.**

PRACTICES TO IMPLEMENT

- **COLORS:** Use less than five different colors and refer to your logo to choose a palette that fits your brand. The top 100 farm websites average 3.7 colors.
- **WHITE SPACE:** Leverage white space to create a clean look. Off-set text or mix in images between paragraphs.
- **FONTS:** Use 1-2 web-safe fonts across the site. Avoid ones that are difficult to read. Top 100 farm websites average 1.8 fonts.
- **PHOTOS:** All images should be high resolution, non-blurry, and have simple backgrounds.

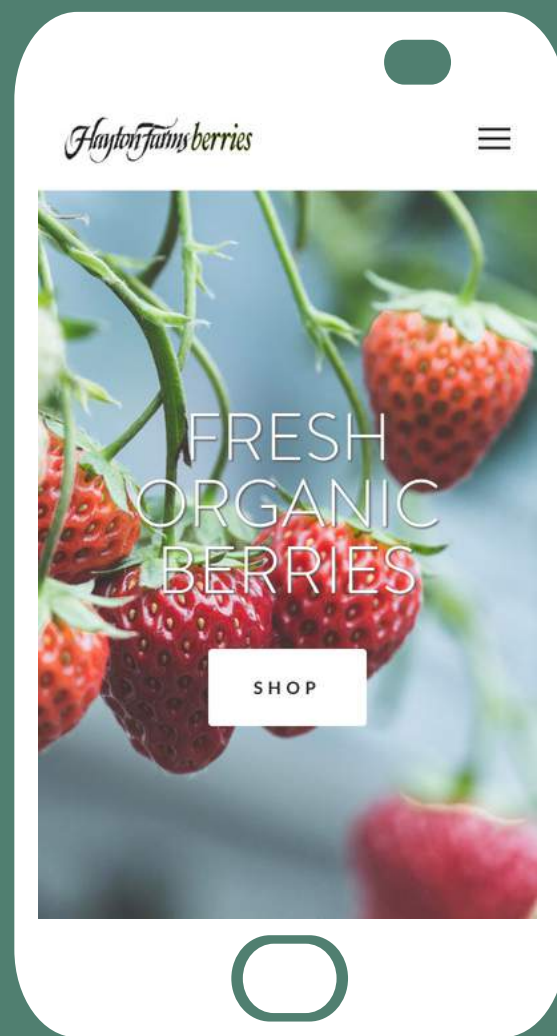
MOBILE OPTIMIZATION

If your website isn't easy to navigate on a smartphone, visitors won't want to stick around. **In 2020, 65% of online sales occurred through mobile and social media, where the remaining 35% occurred through desktop and email.** Search engines like Google recognize whether or not your website is mobile-friendly, prioritizing these sites on first page results (aka Mobile SEO). Barn2Door found that 100% of the top 100 farm websites have mobile-friendly sites.

PRACTICES TO IMPLEMENT

- **THINK SMALL SCREEN:** Scale it down, remove excess information, and keep it simple so visitors can easily navigate your site and access your farm store, regardless of the devices they're using.

"In 2020, 65% of online sales occurred through mobile and social media."



- **CREATE A CONSISTENT USER EXPERIENCE:** What works on a desktop may not be true for a mobile device. Consider the format of your menu bar or pop-ups and how they will read from desktop to smartphone. Create your content in a layout that is both desktop and mobile-friendly.

LESS IS BEST. KEEP IT SHORT!

Quick snippets of information that can be digested in seconds (with prompts to learn more) are the best way to retain visitors. Your content needs to be short and consumable, but it also needs to serve multiple purposes. Consider the experience and expectations of first-time visitors versus repeat buyers.

PRACTICES TO IMPLEMENT

- **SHORT FORM CONTENT:** Organize information in bite-sized pieces (3-4 sentences max). Mix in images to break up the text and use bullet points instead of paragraphs.
- **LONG-FORM CONTENT:** Link long-form content (in a downloadable PDF) within short copy to give visitors the option to learn more. Set expectations on how long it will take to consume the content (e.g., 10-minute read).
- **CALL-TO-ACTION (CTA):** A CTA is a button or link inviting a visitor to take the next step when navigating your website. Anticipate the needs of your visitors, including a clear CTA to bring them to 'Shop,' 'Learn More,' or 'Find my Farm.' Your customers should be able to access your farm 'Shop' in less than 1 second from any page.

100% of the top 100 farm websites include a "Shop" CTA on their home page or in the menu bar, providing one-click access to their farm store immediately.

SIMPLIFY THE NAVIGATION

Visitor's #1 priority on your website is to shop your farm store. A simplified navigation format will minimize confusion and drive visitors to find what they need. 100% of the top 100 farm websites employ a top-bar navigation menu versus a sidebar.

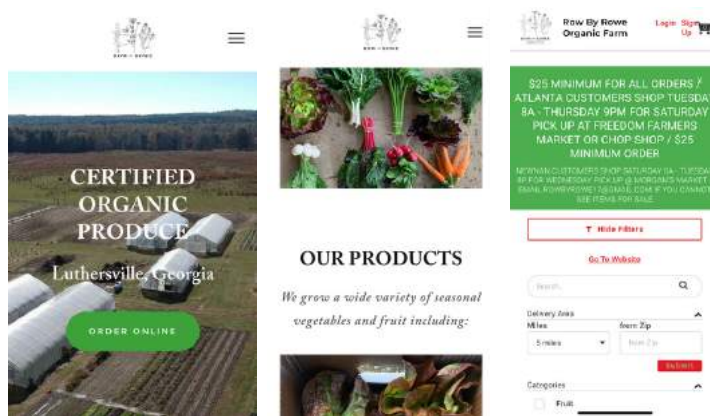
Eliminating unnecessary menu options will drive your conversion rates and reduce visitor bounce. The top 100 farm websites average only 7.7 pages total (including all subpages).

PRACTICES TO IMPLEMENT:

- **HOMEPAGE:** Feature a powerful image with a short message conveying your farm brand. A simple CTA visible on the top of the homepage will be critical to driving conversions.
- **ABOUT PAGE:** The 'About Us' page should communicate who you are and why you are farming. Remember to include a CTA like 'Shop' or 'Subscribe' offering visitors to take the next step.
- **CONTACT PAGE:** Include the contact page in your menu bar. Provide your location, a contact form, operating hours, and social media links. Do NOT include your phone number or email address - or you'll simply clog your inbox and attract robocalls.
- **PRODUCT PAGE:** Content that is accompanied by relevant photos gets 94% more views than plain text. A simple layout where your products' images can shine accompanied by a short description (1-2 sentences max) will get your message across.
- **CARRY FORWARD CTAs:** Your visitors should never be left guessing what to do next. **Include a "Shop" or "Learn More" CTA at the bottom of every subpage to carry visitors to the next action.**

77% of the top 100 farm websites include the About, Contact, and Product pages in their menu bar. Less than 20% use pages like Gallery, FAQ, Events, Recipes, or Practices.

Websites should be clear, digestible, and easy to navigate, providing pathways to help visitors easily get from Point A to Point B. A subpar website will negatively impact purchases and will cause visitors to leave prematurely. **An intuitive online experience where visitors can access your Farm store with a click-of-a-button will increase your success and drive sales.**



Barn2Door is the largest farm ecommerce software provider in America and focuses on helping farmers to sell direct, providing the software and the services to grow and manage their businesses.

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OFA Policy Positions

Each year, Organic Farmers Association solicits input on policy priorities and policy positions from all U.S. certified organic farmers and organic farm organizations.

The OFA Policy Committee reviews the results and OFA members make comments on the drafted policies. Farm members of Organic Farmers Association vote on these policy positions.

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

OFA Policy Process

How OFA annual policies are made.



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priorities &
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Policy
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reviews & refines
policy position
proposals



All OFA
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& comment on
proposed
policies



Policies are
added to OFA
Policy Platform

60% National
vote & 2/3 of
regional votes at
60% is needed to
pass



OFA Organic
Farmer Members
vote on policies



Policy Committee
finalizes edits

Governing
Council
approves

OFA 2021 New Policies

The 2021 New OFA Policies were passed in late May after a 30 day ballot period open to OFA certified organic farm members. These policies were passed by at least 60% of the popular national vote AND 60% popular support from at least two-thirds of the six regions. These policies will become part of the Organic Farmers Association Policy Platform.

BEGINNING FARMER & TECHNICAL ASSISTANCE

OFA SUPPORTS expanding governmental support for organic production through increased funding for organic agriculture, education, and technical assistance by non-governmental organizations (NGOs), land-grant universities, and extension; providing internal staff education on organic agriculture; and hiring leadership with demonstrated organic experience throughout the USDA and state agencies. (Adopted by the farmer membership 2021.)

CLIMATE CHANGE & ENVIRONMENTAL POLICIES

OFA SUPPORTS addressing the pressing need to address climate change by providing targeted support, including payment programs, to farmers for practices that prioritize the multiple benefits of organic practices including building soil organic matter, soil health, and other ecosystem services, and that these programs provide a fair way for farmers who have already adopted these practices, small farms, diversified farms, and farms in all regions of the country to participate without burdensome or expensive validation methods. (Adopted by the farmer membership 2021.)

OFA SUPPORTS policies that provide farmers with support for adapting to and dealing with increasing challenges arising from climate change. (Adopted by the farmer membership 2021.)

CONTAMINATION

OFA SUPPORTS a revision to the RMA Organic Crop Insurance Program for first-year organic crop insurance applicants to receive the organic price for their crop insurance. The revision should specify that organic inspection should occur by the RMA crop insurance deadline (July 15), but the final review and final certificate are not required by the July 15 deadline for eligibility for an organic price for crop insurance. (Adopted by the farmer membership 2021.)

CROP INSURANCE

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HYDROPONICS / CONTAINER GROWING

OFA SUPPORTS organic certification of crop production where typical terrestrial plants are grown to maturity in the ground with no barriers between the topsoil, subsoil and bedrock. The plants must obtain the majority of their nutrients from that soil rather than from highly soluble fertilizers. OFA OPPOSES organic certification of hydroponic production and other production systems which do not meet the preceding requirement and URGES the NOP to revoke the organic certification of such operations. (Adopted by the farmer membership 2021.)

OFA SUPPORTS the NOP requiring a three-year transition period after the use of prohibited substances or activities on any part of a location that will produce certified organic crops or livestock, including the land under containers, mulches, benches, structures and inside greenhouses, hoop houses, tunnels, or other structures. (Adopted by the farmer membership 2021.)

ORGANIC INTEGRITY

OFA SUPPORTS targeted organic education and a Memorandum of Understanding among the NOP, Department of Justice, Customs and Border Protection, and other relevant agencies to deter both import and domestic fraud within the organic market. (Adopted by the farmer membership 2021.)

OFA SUPPORTS criminal prosecution of intentional organic fraud because unpunished fraud diminishes the value of the label. (Adopted by the farmer membership 2021.)

OFA SUPPORTS more NOP resources dedicated to collaborating and sharing information with our foreign organic partners who have developed strategies to deter and discover fraud. (Adopted by the farmer membership 2021.)

OFA SUPPORTS extra scrutiny of imports from jurisdictions where the USDA cannot enforce its rules with penalties for fraud. (Adopted by the farmer membership 2021.)

OFA SUPPORTS increased NOP enforcement measures and transparency of enforcement taken within the Pasture Compliance Program both on certifiers and operations, and a focus on the operations with the highest risk for non-compliance. (Adopted by the farmer membership 2021.)

OFA SUPPORTS increasing the requirements to improve or maintain soil health in organic certification. (Adopted by the farmer membership 2021.)



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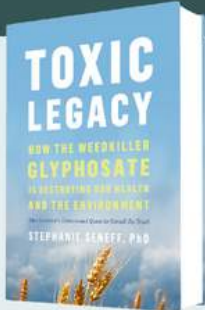
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ORGANIC RESEARCH

OFA SUPPORTS research that compares organic and conventional no-till production systems and the difference in carbon sequestration ability over the long term. (Adopted by the farmer membership 2021.)

OFA SUPPORTS research that identifies the value of nutrition, human health, environmental benefits, and net dollars produced per acre or animal unit for organic production rather than the typical yield-based assessment. (Adopted by the farmer membership 2021.)

OFA SUPPORTS research that quantifies the scope of fraud within the organic industry and the economic impact of fraud on domestic certified organic producers. (Adopted by the farmer membership 2021.)

OFA SUPPORTS research into methods for improving soil health and the development of more organic biological and cultural management of disease, weeds, and pests so these methods do not hinder soil health. (Adopted by the farmer membership 2021.)

To review the complete policy platform, click to visit: OrganicFarmersAssociation.org/Policy-Position



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