



ORGANIC FARMERS ASSOCIATION

April 29, 2021

U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Re: Docket Number USDA-2021-0003

Dear Secretary Vilsack,

The Organic Farmers Association appreciates the opportunity to offer comments on USDA's "Request for Public Comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad" (Docket USDA-2021-0003).

OFA is a membership organization that represents America's certified organic farmers. Our organization was founded by and is controlled by certified organic farmers, and only domestic certified organic farmers vote on OFA's policies and leadership. Our members are concerned about the climate crisis and have been documenting climate change on their farms for decades through careful recording of changes in planting and harvest dates, frost dates, rainfall and temperature patterns. In recent years, severe weather events have been a more forceful reminder that the climate is changing and that we must make societal changes to achieve a better balance.

It is vital that as a nation we reduce or eliminate fossil fuels to reduce the major sources of carbon emissions into the atmosphere. At the same time, we must implement policies that encourage practices that sequester carbon to remove it from the atmosphere as well as practices that support healthy soil that is able to hold water, preventing erosion and desertification.

Organic farming can play a critical role in fighting climate change and helping the agriculture sector adapt to a changing climate. Organic regulations require certified organic farmers to implement beneficial carbon sequestration practices by eliminating chemical soil disturbance through the prohibition of synthetic fertilizers, herbicides, and other crop protection chemicals.

The standards require organic farmers to adopt tillage and cultivation practices that “maintain or improve” soil condition.

A fundamental principle at the foundation of organic farming is that organic management is a holistic production practice that aims to manage the farm as an ecological system. Therefore, an organic farmer doesn’t merely focus on using best practices on a specific field, or on farming without chemicals, but must also consider soil health, crop diversification, crop rotation, fostering biodiversity in and around fields, and market diversification. A diverse ecological systems approach is the organic farmer’s best insurance program because it not only builds carbon in soil and vegetation, but also builds resilience for the farm and its host ecosystem in the face of climate change and other disruptions.

Unfortunately, U.S. agricultural lands host a greatly diminished diversity, with a handful of commodity crops dominating the landscape and economy of farming. Agriculture in our nation has not always been so ecologically unstable, but most of our agricultural policies have incentivized a disproportionate commitment to non-human-food crops that service feedlots, fructose and ethanol. As a result, pragmatic farmers who have simply been responding to the economic imperatives laid before them, are now vulnerable to the long-term systemic effects of fossil fuel-intensive, non-diversified farming, i.e., flooding and/or drought, soil loss and degradation, dependence on imported nitrogen fertilizers and expensive chemical inputs, limited markets, and poor diets. This puts our nation’s food security at risk, not to mention our long-term ecological stability.

OFA encourages the USDA to proceed with a “whole-farm view” as you establish a climate plan. This approach brings hope and practical solutions for climate stability. The organic farming community already demonstrates hopeful, diverse and feasible strategies for geographically specific mitigation of, and adaptation to, climate change.

Organic is a growing sector of the U.S. agriculture system, with tremendous potential to address climate change, help family farms flourish, revive rural communities and protect public health. But for organic agriculture to meet its potential, we need USDA to take several steps to protect the integrity of the USDA certified organic label. The USDA sets the regulations and standards that must be met by products that bear the organic label. Certified organic farmers rely on this label to accurately convey information about their products in the marketplace. But the USDA has considerable work to do to maintain the standing of the organic label with consumers and ensure a level playing field for organic farmers, including finishing long-delayed updates to regulations and increasing the agency’s focus on enforcement.

In addition to these general concerns, we offer the following comments in response to the specific questions posed for public comment.

1. Climate-Smart Agriculture and Forestry Questions

1. *How can USDA leverage existing policies and programs to encourage voluntary adoption of agricultural practices that sequester carbon, reduce greenhouse gas emissions, and ensure resiliency to climate change?*

USDA certified organic is a robust existing program that USDA should leverage as part of its response to the climate crisis. Researchers comparing the carbon sequestration ability of certified organic soils and conventional soils have consistently shown that organic soils outperform conventional soils' ability to sequester carbon.¹ A meta-analysis of 20 organic/conventional comparison trials around the world showed that organic systems accrued an average of 400 pounds of carbon per acre per year more than conventional systems.² Another meta-analysis of 59 studies found total soil organic carbon averaging 19 percent higher in organic than conventional systems.³ A 2019 comprehensive meta-analysis looked at 528 studies that had compared at least one organic farm to at least one conventional farm.⁴ This meta-analysis found that on average, organic soils had a 10 percent higher organic carbon content than conventional soils and sequestered 230 more pounds per acre of carbon each year than the conventional soils, and concluded that converting farmland from conventional to organic production would have “a cumulative climate protection performance... of 1,082 kg CO₂ equivalents per hectare per year” equivalent to eliminating 963 pounds of CO₂ emissions per year for each acre converted.⁵

In addition to carbon sequestration, certified organic farms use the sequestered carbon to build healthy soils, which are instrumental in productive hydrological cycles. In the U.S., a nationwide study that sampled 659 organic fields and 728 conventional fields showed 13 percent higher total soil organic matter (SOM) and 53 percent higher stable SOM in the organic soils.⁶ Organic soil management also shows additional climate benefits such as higher aggregate soil stability (15 percent higher) and reduction of soil erosion and soil loss occurrences 22 percent and 26 percent lower, respectively.⁷ High SOM in healthy soil is

¹ National Sustainable Agriculture Coalition. 2019. Agriculture and Climate Change: Policy Imperatives and Opportunities to Help Producers Meet the Challenge. Washington D.C.

² Gattinger, A., A. Muller, M. Haeni, C. Skinner, A. Fliessbach, N. Buchmann, P. Mader, M. Stolze, P. Smith, N. E. Scialabba, and U. Niggli. 2012. Enhanced topsoil carbon stocks under organic farming, PNAS, 109 (44) 18826-18231.

³ Lori, M., S. Symnaczik, P. MaEder, G. De Deyn, A. Gattinger. 2017. Organic farming enhances soil microbial abundance and activity – A meta-analysis and meta-regression. PLOS ONE. <https://doi.org/10.1371/journal.pone.0180442> July 12, 2017, 25 pp.

⁴ Sanders J and J. Hess (Eds), 2019. Leistungen des ökologischen Landbaus für Umwelt und Gesellschaft. Braunschweig: Johann Heinrich von Thünen-Institut, 364 p, Thünen Report 65. Accessed May 2, 2019 at: https://www.thuenen.de/media/publikationen/thuenen-report/Thuenen_Report_65.pdf

⁵ *Ibid*, 186.

⁶ Ghabbour, E. A., G. Davies, T. Misiewicz, R. A. Alami, E. M. Askounis, N. P. Cuzzo, A. J. Filice, J. M. Haskell, A. K. Moy, A. C. Roach, and J. Shade. 2017. National Comparison of the Total and Sequestered Organic Matter Contents of Conventional and Organic Farm Soils. *Advances in Agronomy*, 146: 1-35.

⁷ *Ibid*.

essential for holding water, which helps reduce soil loss, erosion and prevents desertification. Soils with high SOM can hold water for longer, sustaining plants through a drought; thus, prolonging soil cover with photosynthesizing plant growth for a longer period. Increased photosynthesis sequesters carbon from the atmosphere into the plant to support plant growth. Increased plant cover also provides cooling benefits through transpiration, the evaporation of water from plant leaves. Expansive forests and grasslands create large amounts of transpiration that produce significant water vapor in the atmosphere, increasing precipitation and cloud cover, both offering beneficial climate cooling.

Moving more farms towards organic management is essential and USDA certified organic provides a ready-made solution with a market-based approach that can be implemented quickly and widely. But for organic agriculture to provide the maximum benefit in addressing the climate crisis as well as ensuring the economic viability of more farms, improvements must be made to the USDA's National Organic Program (NOP) enforcement activities and oversight of organic certifiers. We also urge the NOP to adhere to the goal of continuous improvement by tightening the organic standards on several issues that would make organic even more meaningful as a climate-friendly practice, including finalizing stalled regulations for livestock (the Origin of Livestock rule and the Organic Livestock and Poultry Practices rule) and enforcing the pasture standard to guarantee that organic animals are raised in climate-friendly pasture-based systems.

Livestock Standards

Origin of Livestock Rule: The NOP'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. Organic dairy farmers need a level playing field. Years of delay in closing loopholes in the organic standards for livestock have caused ongoing economic harm. We need the NOP to finalize an enforceable rule on Origin of Livestock as quickly as possible. The NOP must work to finalize this important rulemaking as quickly as possible with a final rule that can be consistently enforced and that requires that the entire one-time transition happen over a twelve-month period under the supervision of an organic certification agency as part of the producer's Organic System Plan. Cycling dairy animals in and out of organic production must be prohibited, and once a distinct herd is transitioned to organic, all animals must be raised organically from the last third of gestation.

Organic Livestock and Poultry Practices Rule: The Organic Livestock and Poultry Practices (OLPP) rule is another long-overdue measure to strengthen the organic standards, which was delayed and ultimately withdrawn by the Trump Administration. The OLPP final rule would allow the NOP to consistently enforce stronger animal welfare standards on organic farms and close loopholes being taken advantage of by some large operations. The rule was discussed and vetted in the organic community for more than a decade and has widespread support. We urge you to reinstate the final OLPP rule as quickly as possible.

Ensuring that Organic Farming is Soil-Based

Healthy soil is essential to healthy organic food, healthy ecosystems and efforts to address climate change. The Organic Foods Production Act lays out requirements for soil fertility for organic farms and building soil health is a foundational principle of organic agriculture. The NOP's decision to allow hydroponic (soil-less) operations to be certified organic, as well as new controversy over inconsistent interpretation of the NOP's guidance for how container operations transition to organic, could undermine consumer confidence in the organic label overall and reduces the potential for organic agriculture to sequester carbon. The NOP should clarify that organic farming occurs in the soil and ensure that all organic certifiers are consistently applying this requirement. For organic agriculture to maximize its potential as climate-friendly agriculture, soil must be recognized as the cornerstone of organic production.

Improving Conservation Programs for Organic Operations

Earmarking a certain percentage of the Agricultural Conservation Easement Program (ACEP) for the preservation of certified organic farmland will incentivize carbon sequestration through organic production. The Natural Resources Conservation Service (NRCS) uses ACEP to purchase easements on farms to prevent the ground from being developed. If there was a goal or earmark to prioritize preservation of certified organic or transitional acreage, then the NRCS dollars that go towards preserving farmland will be preserving farmland that supports production known to sequester carbon.

We also urge you to consider provisions in the recently reintroduced Agriculture Resilience Act (H.R. 2803), which includes several revisions to the Conservation Security Program that would allow certified organic producers to better utilize this important program and explore if those changes could be made administratively.

Restoring Organic Certification Cost Share Reimbursement

All certified organic operations must complete annual inspection and certification. The federal government has historically reimbursed up to 75 percent of organic certification fees paid by organic farms and businesses, with a maximum reimbursement of \$750 per certification scope (crops, livestock or handling) per operation. In 2020, USDA's Farm Services Agency (FSA) cut reimbursement rates for 2020 certification costs to 50 percent, up to a maximum of \$500 per scope. This action leaves organic operations – who had been planning on being reimbursed for their certification costs at the same level as previous years – burdened with an unplanned expense, in the midst of a period of higher costs and disrupted markets caused by the pandemic. The cost share program is particularly important to small and mid-sized organic farms, and those who are just starting out with organic certification. USDA must restore the funding levels for this program and ensure this shortfall does not happen again. As a part of any long-term USDA plan for addressing climate change, organic certification cost share should be expanded to cover a higher percentage of certification costs and reoriented to make the

upfront cost of certification lower, rather than be structured as a reimbursement. This would lower one of the barriers to getting more farms to become certified organic.

2. What new strategies should USDA explore to encourage voluntary adoption of climate-smart agriculture and forestry practices?

As described above, OFA believes USDA's climate plan should focus on the strengthening the integrity of the organic standards and support for organic operations through an enhanced certification cost share program and easier access to conservation programs. In addition to those improvements to existing programs, the USDA should consider the creation of a national organic agriculture transition program. This would entail a federal program with targets for involving a significant number of U.S. farms to transition significant domestic acreage to organic management. Starting with three years of financial incentives during the high-risk transition period, farmers would then need more market-driven support in the form of a fair marketplace and access to federally subsidized insurance and incentive programs equal to that of non-organic farmers. The program would also need to provide technical assistance funding to organic farm organizations to help farmers in transition as well as professional development training to NRCS and other USDA agencies to support farmers using existing programs for their transition.

C. How can USDA help support emerging markets for carbon and greenhouse gases where agriculture and forestry can supply carbon benefits?

OFA urges USDA to focus its climate efforts, including support for or establishing new payment programs, on programs that recognize the multiple benefits of organic practices including building soil organic matter, soil health and other ecosystem services. USDA must also ensure 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. USDA must explicitly consider:

- Whether market-based programs are accessible for small-scale, diversified, direct-market and organic farms.
- What kinds of contract practices are used in private payment programs and provide education to producers about what to look for in contracts. USDA should also evaluate the need for potential action to rein in any abusive contract terms that might be found in private programs, such as nondisclosure requirements or mandatory arbitration requirements.
- How to address "early adopters" who may have sequestered carbon or improved soil health previously due to farming practices that occurred before a payment program existed, but who may not be able to document additional gains moving forward.

- Whether measurement or validation procedures for participants in payment programs are burdensome or so expensive that they wipe out any possible returns from participation. Similarly, USDA should examine potential privacy concerns for farm production data that is collected by payment programs as part of verification efforts.

D. What data, tools, and research are needed for USDA to effectively carry out climate-smart agriculture and forestry strategies?

USDA should include in its climate plan expanded support for organic through increased funding for organic education and technical assistance by USDA, state agencies, universities, non-governmental organizations and extension; providing internal staff education on organic; and hiring leadership with demonstrated organic experience throughout the USDA.

We urge the USDA to prioritize research to document how organic practices can maximize carbon sequestration, as well as documenting the multiple benefits created by organic practices. Organic research often addresses challenges or identifies practices that are also relevant to farmers who are not certified organic or who farm conventionally. An increased focus on soil health, alternatives to chemical pest management and cover crops across all sectors of agriculture show that this kind of research can serve an audience that is wider than certified organic. Additionally, we urge the USDA to address the devastating impact of the decision to move the Economic Research Service and the National Institute of Food and Agriculture out of Washington, DC as it develops its plan on climate. The move led to dramatic staffing shortages and low morale, and took these critical staff out of conversations happening at USDA headquarters. USDA must prioritize filling vacant positions at these research agencies and ensure that the location of their offices does not impede their ability to fully participate in USDA's climate efforts.

4. Environmental Justice and Disadvantaged Communities Questions

A. How can USDA ensure that programs, funding and financing capacities, and other authorities used to advance climate-smart agriculture and forestry practices are available to all landowners, producers, and communities?

B. How can USDA provide technical assistance, outreach, and other assistance necessary to ensure that all producers, landowners, and communities can participate in USDA programs, funding, and other authorities related to climate-smart agriculture and forestry practices?

C. How can USDA ensure that programs, funding and financing capabilities, and other authorities related to climate-smart agriculture and forestry practices are implemented equitably?

Any USDA program must be accessible and feasible for all types and sizes of farms – organic, diversified, small-scale, in all regions of the country. Historically, this has not always been the case for USDA programs from crop insurance to research to payment programs like the Coronavirus Food Assistance Program. It is vital that USDA’s plan for climate does not repeat past mistakes by focusing only on large-scale conventional farms raising commodity crops in a few regions of the country. USDA should prioritize further outreach to all types of farmers and engage communities of color in particular to find out how to design programs that will work for everyone. The Rural Coalition has submitted comments on this issue that provide some specific ideas for how to do this outreach that we urge you to consider.

And with regard to organic, there is also more work to do. Despite the dramatic growth of the organic industry and the NOP, our farmers’ experience with other divisions within USDA shows that many USDA employees are still not familiar with organic. In order to encourage other USDA divisions to make their programs more feasible for organic producers, we urge you to reinstate the position of organic policy advisor that was created during the Obama Administration. We also urge you to expand the NOP’s outreach and education to other federal partners such as various policy divisions of the White House, including the Office of Science and Technology Policy. And we urge the NOP to increase outreach and education of other USDA divisions, such as APHIS, and federal agencies like the Environmental Protection Agency about the impact that genetically engineered crops and associated herbicides have on the organic sector from genetic and chemical drift.

Another key criteria for making sure that new programs to address the climate crisis work for all types of farms and all types of farmers is for the USDA to focus on the core concept that farmers cannot help the climate if they can’t afford to keep farming. Economic viability of farms and providing adequate infrastructure for thriving local and regional food economies must be stated goals for USDA’s efforts on climate. For organic, that means that climate policy must include improved organic standards and stepped up enforcement to make sure that organic markets provide a level playing field and a fair price for farmers and a fair wage for workers.

We appreciate the opportunity to comment on this critical subject and USDA’s priorities.

Sincerely,



Kate Mendenhall
Executive Director