



# ORGANIC FARMERS ASSOCIATION

April 6, 2022

Under Secretary Jenny Lester Moffitt  
U.S. Department of Agriculture  
1400 Independence Avenue SW  
Washington D.C. 20250

Dear Under Secretary Moffitt:

The Organic Farmers Association (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.

OFA urges you to act swiftly to implement an important recommendations from the National Organic Standards Board, to prohibit the use of non-synthetic ammonia extract classified as stripped ammonia and concentrated ammonia.

OFA's policy calls for the prohibition on ammonia extract in organic production because such use is incompatible with the Organic Foods Production Act and good soil health practices. Therefore, we urge the National Organic Program to implement the 2021 NOSB recommendation on ammonia extract as soon as possible.

The NOSB recommendation is based on thorough discussion by the NOSB and the organic community, and there is broad agreement that this action is needed to protect the integrity of the organic seal. Ammonia extract fertilizers are high nitrogen fertilizers, and their use can short circuit soil-building practices, violating the 'feed the soil' principle that is a bedrock of organic agriculture.

As the USDA embarks on a plan to define and promote climate-smart agriculture, it is critical that the organic standards are clear that organic agriculture is based in soil, requires soil-building practices, and requires pasture-based grazing for livestock. Swift action to list ammonia extract as a prohibited non synthetic material will help ensure that organic agriculture is indeed climate-smart.

There is a high level of agreement within the organic community that these materials should be banned and that their inclusion is harmful to organic integrity. It is important for the National Organic Program to act now, before confusion about what is permissible allows these products to get a foothold in organic markets. Delay only makes the process of implementing the NOSB's recommendation more disruptive when it is completed.

Thank you for your attention to this issue. Please let us know if you have any questions or need more information.

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Mendenhall".

Kate Mendenhall

Director