Dear Deputy Administrator Tucker and Ms. Claypool,

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. We appreciate the opportunity to provide input on ways in which organic infrastructure investments could support increased access to processing, storage, distribution, and consumer markets.

Each year OFA organic farmers determine policy positions and priorities. This policy platform provides a helpful overview of how Organic Transition Initiative funding for infrastructure can be most helpful in increasing market access. OFA farmers support programs that facilitate the creation of small farmer production, processing and marketing cooperatives, and they support initiatives that promote organic market development to historically underserved, minority and beginning.

OFA farmers also know that efforts to grow organic markets through targeted investments in infrastructure will be most effective when paired with strategic policy changes. For example, organic producers need competitive markets for agriculture and food products. In addition to investments in infrastructure, policy changes are needed to reduce current and future consolidation, limit mergers, redirect food and farmer subsidies toward local producers, and encourage local economic resilience through building regional food systems that support local producers, processors, and distributors and communities.

OFA farmers also support policy changes to permit state-inspected meat to be sold within that state would aid in market development by eliminating the intrastate marketing barriers placed on livestock farmers by the requirement for USDA inspected livestock slaughter and processing facilities which are few and far between. This would make investments in infrastructure like processing facilities more worthwhile and support market expansion.

In addition to these helpful policy changes, OFA farmers have shared specific infrastructure improvements that would increase market access and aid in market development.
Organic farmers across the board, from vegetable growers, to grain producers, to livestock and dairy farmers would all benefit from investments in processing facilities, water infrastructure, and better access to storage and processing facilities, funding for farmer coops, and funding to study where the bottlenecks are in moving organic products to market.

Other specific suggestions we’ve heard from our organic farmer-members include the following:

- Alfalfa growers need pellet mills to make their product more transportable. This would better support forage farmers as well as organic dairy farmers.
- Grain farmers need grain cleaning infrastructure, and grants for on-farm infrastructure like grain bins.
- Solar panels on farm roofs could help offset energy costs and allow farmers to put more disposable income into on-farm infrastructure needs.
- Incentives could encourage existing processing facilities to install upgrades and become licensed to process certified organic products.
- Commitment from federal agencies to prioritize the purchase of USA-grown organic products would open new market opportunities.
- Organic dairy farmers need diversified processing facilities that can package milk for use in institutional markets like schools and hospitals.
- Revision to AMS requirements for Regional Dairy Innovation Centers would make grants more useful for farmers to fully implement necessary on-farm infrastructure needs, modernize existing facilities for a changing market, and fully-utilize the support from the Regional Dairy Innovation Centers.

We appreciate the opportunity to provide feedback on this critical issue, and look forward to continued conversations. If you have questions or need more information, please contact our policy director, Lily Hawkins, lily@organicfarmersassociation.org, (267)231-2216.

Sincerely,

Kate Mendenhall
Executive Director