



**ORGANIC FARMERS
ASSOCIATION**

August 26, 2024

U.S. Department of Agriculture
Federal Crop Insurance Corporation

Docket No. FCIC-24-0003
Re: Expanding Options for Specialty and Organic Growers

Dear Federal Crop Insurance Corporation,
The Organic Farmers Association (OFA) is a membership organization that represents domestic 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 comment on the expanded options for specialty and organic growers. (Docket No. FCIC-24-0003) The Organic Farmers Association supports the Enterprise Unit expansion to include organic farming practices under section 34(a) through (c) of the CCIP Basic Provisions.

Organic farmers frequently manage land that is organic, transitional (in the 36 month transition period leading to organic certification), and conventional simultaneously. This makes both management systems and crop insurance scenarios complicated and sometimes cumbersome. The expansion of Enterprise Units for organic use will offer organic farmers juggling various systems more reasonable options for risk management. We also acknowledge the progress made and efforts to serve specialty crop producers. We appreciate the way RMA has been in direct communication with organic producers to understand the issues and collaboratively brainstorm solutions.

The Ohio Ecological Food and Farm Association (OEFFA), an OFA member organization, offered detailed comments regarding the expanded Enterprise Units. We appreciate and underscore these comments. We look forward to partnering with RMA to ensure a fair, functional, informed safety net will serve the unique needs of organic producers.

Sincerely,

Julia Barton, Farmer Services Director

Organic Farmers Association