



February 20, 2025

The Honorable Brooke Rollins  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue SW  
Washington, D.C. 20250

Dear Secretary Rollins,

The Organic Farmers Association congratulates you on your recent confirmation. We look forward to working closely with you and your team on issues that are critically important to organic farmers.

The Organic Farmers Association (OFA) is a membership organization that represents America's 18,000 certified organic farmers. OFA is farmer-founded and farmer-led, with our policy positions and leadership determined solely by domestic certified organic farmers.

Through a public-private partnership, the USDA sets the regulations and standards that must be met by products that bear the organic label and certified organic farmers rely on this label to accurately convey information about their products in the marketplace. Because consumers trust the integrity of the organic label, the organic sector has experienced tremendous growth and provided a path to economic viability for many domestic family farms. The U.S. organic market is booming, nearing \$70 billion in sales in 2023, with four out of five U.S. households regularly purchasing organic products. ([OTA Organic Purchasing Study](#), 2024)

Even with growing consumer interest in organic foods, we are unfortunately losing both domestic organic acres and farms. The successful USDA TOPP program is a multi-agency effort to invest in domestic organic farmers, to capture more of the domestic organic market share through U.S. farmgate sales. American farmers are ready to meet the growing domestic demand, but they need access to USDA programs and fair enforcement of organic regulations through the USDA National Organic Program (NOP) to ensure a level playing field in a global market so they can keep pace with that demand.

Based on the input from OFA farmer members and allied organizations from around the country, here are some key ways USDA can help to maintain the standing of the organic label with consumers and ensure a fair market for domestic farmers.

Release Payments to Farmers and Organizations with Signed Contracts: Unfortunately, we have lost a lot of our domestic rural agriculture infrastructure and these mechanisms are necessary for viable local and regional food systems. Organic farmers are investing in building this infrastructure to support a growing U.S. organic agriculture industry. During the pandemic, when the importance of local and regional food systems was made most apparent, the USDA and Congress designed programs to invest in rebuilding the necessary food system infrastructure for greater national food security. In response, organic farmers have made investments in on-farm infrastructure through labor, equipment, conservation practices, buildings, and other expenses, counting on signed USDA contracts to make the financing work.

While certified organic sales are growing, domestic producers in many sectors are struggling to cover their cost of production. They have planned business advancements, growth, and supply chain infrastructure solutions with the security of promised USDA funding to help them take advantage of the economic opportunity presented through strategic investments.

Please ensure that paused USDA funding is resumed without delay to avoid serious harm to the agricultural community. Farmers and the organizations that support them are relying on grants and loans promised through signed contracts for programs such as the Organic Market Development Grant Program and the Rural Energy for America Program. If that funding is not delivered, they could face bankruptcy and loss of their family businesses. We are fielding direct calls from farmers who are facing real financial strain right now and need your support.

Provide Strong Organic Integrity Enforcement to Ensure Stable Markets for U.S. Farmers:

Organic imports have nearly tripled since 2012, reaching nearly \$2 billion in 2023 ([ERS, 2025](#)), however, U.S. organic farm numbers and acreage have declined, pushing the U.S. from third to ninth globally in organic acreage between 2016 and 2022 ([ERS, 2025](#)).

U.S. organic farmers work hard to ensure the integrity of the crops they produce. Unfortunately, higher organic prices and growing market demand can lure fraudulent players into the marketplace. Fraud has caused significant price fluctuations in recent years, destabilized the organic grain market for U.S. producers, and threatened consumers' faith in the organic label. Preventing organic fraud is consistently a top priority for organic farmers in OFA's annual producer survey.

Imports from regions with questionable oversight and that seem to lack sufficient organic acreage to produce the amount of organic product being exported have become common in recent years, while several high-profile investigations have also revealed large-scale schemes in the U.S. to sell fraudulent organic products. Organic farmers need full and consistent enforcement of the USDA organic standards and increased capacity at the NOP to detect and prevent fraud in organic supply chains.

The recently finalized Strengthening Organic Enforcement (SOE) rule was a crucial step to increase organic integrity. As well as ensuring the rule is fully implemented, the NOP must continue to coordinate with other USDA agencies and U.S. Customs and Border Protection (CBP) to increase awareness of organic commodities likely to be imported (and their risk for potential fraud), and to leverage other agencies' inspection resources at points of entry. We urge you to undertake strategic residue testing for substances prohibited in organic agriculture to ensure the integrity of organic bulk imports and provide a level-playing field for domestic organic producers who adhere to the strict USDA NOP standards and program here at home.

Provide Thorough Oversight and Accreditation: One of the critical roles played by the NOP is providing oversight of accredited certifying agencies that inspect and certify organic operations. However many of the controversies that have been long-debated in the organic community boil down to inconsistent interpretation or application of organic regulations by certifiers. We urge the NOP to take seriously its role as an accreditor and to acknowledge that this role is inextricably tied to its enforcement mandate. Ensuring that certifiers consistently interpret and apply the standards, everywhere they operate, is critical to the integrity of the organic label. The NOP is the only entity that can ensure that this happens.

Support Organic Research: Many of the challenges facing the organic sector can be addressed with increased research. 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 wider than certified organic. We urge you to increase USDA's support of organic research.

Increase Organic Outreach within USDA and to Federal Partners: It is clear that, despite the rapid growth of the organic industry and the National Organic Program, many other divisions within the USDA are still not familiar with organic. We 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. Another critical federal partner is Customs and Border Protection. We hope you will prioritize creating an organic advisor position for CBP,

which is a critical piece of the federal effort to prevent fraudulent organic products. We also urge the NOP to increase outreach and education to 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. Organic farmers have a right to farm without contamination, yet contamination is a struggle faced by many organic farms and they rarely have legal or financial protection for the consequences.

Ensure Existing USDA Programs Work for Organic Farmers: Farmers who have invested in the transition to organic certification need the same USDA services and programs that conventional producers depend on. Yet details of those program requirements often make them difficult to access or useless to organic producers.

We urge you to make improvements and adjustments within your jurisdiction to crop insurance, farm credit, and other USDA programs so that they are functional for small, diversified, organic, and regenerative farmers. Please fully staff NRCS and FSA offices in the field so that organic producers have access to personnel with expertise in USDA programs to help them thrive. Providing improved data collection to better understand and address the challenges organic dairies face could help the USDA ensure effective relief programs and develop a functioning safety net for domestic organic dairy producers similar to programs designed for conventional dairy.

We appreciate the opportunity to provide input as you develop your priorities and look forward to working with USDA under your leadership. If you have any questions or need more information, please contact our Policy Director, Lily Hawkins, [Lily@OrganicFarmersAssociation.org](mailto:Lily@OrganicFarmersAssociation.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Mendenhall". The signature is fluid and cursive, with a large initial "K" and "M".

Kate Mendenhall

OFA Executive Director & Organic Farmer