

April 1, 2025

The Honorable Robert F. Kennedy, Jr.
Secretary
U.S. Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue
SW Washington, D.C. 20201

Dear Secretary Kennedy,

The Organic Farmers Association congratulates you on your recent confirmation. We look forward to working with you and your team on issues that are critically important to organic farmers to foster a stronger connection between agriculture management and human health.

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.

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) Through a public-private partnership, the Department of Agriculture (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 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.

Organic producers are at the forefront of truly regenerative agriculture, protecting the health of rural communities and consumers nationwide by avoiding the use of harmful chemical pesticides and genetically modified organisms and building healthy soil.

We hope to work with you to increase agency knowledge about the impact that genetically engineered crops and associated herbicides have on the organic sector and rural health 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. Furthermore, rural communities have a right to live in an environment free from harmful chemicals. Closing the cancer disparity in rural agricultural communities through increasing organic production is a priority of OFA.

We encourage you and the Department of Health and Human Services (HHS) to coordinate and cooperate with the USDA and other agencies to increase the consumption of organic foods in America, such as through the following intra- and inter-agency endeavors.

Expanded Collaboration Between HHS and USDA

American consumers consistently demonstrate that they value organic food, yet many consumers still have trouble accessing healthy food. Increasing access to local and regional organic food (where nutrient density is highest) is important so that consumers can access fresh, healthy organic food free from pesticides and contaminants. Since 2012, the USDA and HHS's agreement to streamline how both agencies' programs work together to support rural health and improve the health and well-being of rural communities through the use of technology and health information has made a significant impact on rural communities and rural health. We encourage you to further expand this partnership to incorporate pesticide-free organic food as a vehicle for Making America Healthy Again through rural health efforts.

Organic Farmers Association represents organic farmers who understand the positive health impacts that organic food production has on our local communities from both a food system and environmental perspective. Expanding the established collaboration between the two agencies to incorporate "food as medicine" programs within the already established work to improve rural health impacts could be a legacy program under your tenure. Several successful "food as medicine" subscription plans link hospitals, clinics, and physicians with patients who need pesticide-free organic food to regain health as an important supplement to other medical prescriptions. We have attached a recent article OFA published in our March 2025 quarterly magazine outlining some of these examples.

USDA and HHS Collaboration to Stop Organic Import Fraud

Another area of HHS and USDA collaboration that could yield important food safety and health benefits is increased residue testing scrutiny at the points of U.S. entry to ensure organic integrity. Domestic organic farmers work hard to ensure the integrity of the crops they produce and that they are free from pesticides and GMO contaminants. Many domestic producers undergo voluntary residue testing for domestic buyers. Yet, organic imports are not currently held to this same scrutiny. Organic imports have nearly tripled since 2012, reaching nearly \$2 billion in 2023 (ERS, 2025). Unfortunately, higher organic prices and growing market demand can lure fraudulent players into the marketplace. Many organic consumers seek

contamination-free food, some with severe sensitivities to chemicals. It is imperative that all organic food be held to the same high integrity standards. Preventing organic fraud is consistently a top priority for organic farmers in OFA's annual producer survey and is essential for consumer trust.

The recently finalized USDA National Organic Program (NOP)'s Strengthening Organic Enforcement rule was a crucial step to increase organic integrity. To fully implement this rule, the NOP must continue to coordinate with other USDA agencies like HHS 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 leverage your FDA border agency testing staff to collaborate with the USDA to undertake strategic residue testing for substances prohibited in organic agriculture to ensure the integrity of organic bulk imports, keep pesticide residues out of the organic food supply chain, and provide a level-playing field for domestic organic producers who adhere to the strict USDA NOP standards and program here at home.

Support Research into the Health Benefits of Organic Food

There has not been enough research on the health benefits of an organic diet, and we encourage you to prioritize this during your time at HHS. While some studies suggest links between pesticide exposure and adverse health effects, conflicting results, methodological flaws and limitations, and study biases challenge our ability to establish the health benefits of reduced pesticide exposure through organic consumption. We need more rigorous research invested in longitudinal studies that consider diverse influencing factors to overcome these limitations and provide a more nuanced understanding of the relationship between organic food consumption and health outcomes (Rahman A., et al., 2024).

<u>Increase Organic Consumption through Restaurant Certifications</u>

During the pandemic, U.S. consumption of organic foods skyrocketed because people increased their cooking and baking at home and were eating out less. The demonstrated consumer interest in higher consumption of organic food exists, but it is hard to find organic food in institution kitchens. In Denmark, they have successfully created large markets that increase public consumption of pesticide-free food through a high increase of organic food in institutional kitchens. This has been supported through investments in the education of kitchen workers in organic, healthy, and pesticide-free meals. Due to these efforts, even hospitals and military barracks feed organic diets. A marketing effort that fuels this adoption is a national Organic Cuisine Label that documents and guarantees 30, 60, and 90 percent organic in restaurants, hotels, workplaces, and public kitchens. This motivates both kitchen workers and consumers and could be another great collaboration between HHS and the USDA. We would be

interested in working with your agency to explore opportunities to increase the public consumption of organic food through institutional kitchens.

Increase Organic Outreach & Coordination Among Federal Agencies

It is clear that, despite the rapid growth of the organic industry and the USDA NOP, many other agencies involved in food safety and environmental policy, as well as divisions within the USDA, are still not familiar with organic. We urge you to coordinate with Secretary Rollins to hire an inter-agency organic liaison to increase collaboration on organic knowledge and policy. This position could help facilitate coordination among U.S. governmental agencies and prioritize Organic Advisor positions at critical agencies like CBP and the Environmental Protection Agency.

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

Sincerely,

Kate Mendenhall

OFA Executive Director & Organic Farmer