



ORGANIC FARMERS  
ASSOCIATION

# WORKING TOGETHER TO MAKE CROP INSURANCE WORK FOR EVERYONE

By Julia Barton

## **CROP INSURANCE FOR EVERYONE**

Crop insurance is a topic that typically makes people's eyes glaze over, but luckily OEFFA farmers aren't typical. For the past year, the Ohio Ecological Food & Farming Association (OEFFA), a founding organizational member of the Organic Farmers Association, has led a Crop Insurance Work Group made up of dedicated, motivated, and technically astute farmers who devoted significant time last winter to make crop insurance more fair, functional, and informed. And they're not alone.

With a changing climate, many farmers who haven't previously engaged with crop insurance recognize the need to have a farmer safety net that works for everyone. Groups like the National Sustainable Agriculture Coalition, which has long worked on crop insurance issues, the National Organic Coalition, and others are working together to hold public institutions accountable for supporting farmers, particularly organic, sustainable, and regenerative farmers. In good company, Organic Farmers Association farmer -members have voted on a number of policy positions calling for crop insurance reform over the years.

## **CROP INSURANCE SHOULD BE FAIR TO FARMERS AND THE BROADER COMMUNITY**

While crop insurance works well for a few commodity crops, it does not currently serve the broader community of organic, sustainable, and regenerative farmers. It also takes advantage of taxpayers, subsidizing the cost of crop insurance for large farms at the same rate it does a small, beginning farmer.

The OEFFA farmer working group wants crop insurance to be more fair, and urges the following key recommendations:

- Each operation should receive one subsidy and no more. The farm bill should include a strong "actively engaged in farming rule" to set this limit so farmers who are trying to "double dip" with multiple "paper farms" are prevented from cheating.
- Crop insurance should only apply to land that is suitable to be farmed. The farm bill should prohibit crop insurance premium subsidies on unsuitable land. Taxpayers should not subsidize irresponsible land management.

The farm bill can better support beginning farmers with less costly crop insurance policies, continue to support the majority of farmers with policies valued between \$10,000-\$100,000, and reduce the rate of support for the largest farms holding policies costing more than \$100,000.

## **CROP INSURANCE SHOULD BE FUNCTIONAL IN SUPPORTING SMALL, DIVERSIFIED FARMERS, AND FARMERS USING ORGANIC AND REGENERATIVE PRACTICES**

Crop insurance is designed to serve conventional farmers, so its policies align with conventional commodity agriculture practices. But organic farmers have additional standards to which they are accountable and farm in partnership with ecological systems, and regenerative farmers are also working within those ecological systems.



To better serve them, OEFFA producers offer the following recommendations to make crop insurance more functional for organic, transitioning, and family-scale diversified farms:

- Organic producers often plant later than their non-organic counterparts due to strategic organic systems management. The USDA's Risk Management Agency (RMA) must establish a unique final planting date for certified organic crops in each region with a non-penalizing grace period so producers can maintain productivity and organic status.
- Organic producers should use the transition period to develop an organic management system and write their Organic System Plan (OSP) in conjunction with their application for organic certification. RMA should provide organic insurance to producers transitioning to certified organic status without requiring an OSP.
- A clear, transparent, consistent path for organic transition and crop insurance must be established. As the USDA invests \$300 million in organic transition, transitioning operators must be supported through a streamlined farm safety net.
- Create an Enterprise Unit (EU) by Practice Type option for organic status. This would enable operators to group their organic, transitional, and non-organic land separately so that each type could be both managed and insured appropriately.
- Whole Farm Revenue Protection, a type of crop insurance intended to serve small and diversified producers, must be tweaked to better support diversified producers through lower premium costs associated with higher levels of diversity, and true revenue protection for operations already mitigating risk through diverse production systems.

## CROP INSURANCE RESOURCES FOR ORGANIC FARMERS

Interested in crop insurance and want to learn more? You're in good company. Check out these resources on crop insurance for organic farmers.

- Join the OFA Crop Insurance working group this winter as we continue to hone our positions and work together at creating change. (Email [julia@organicfarmersassociation](mailto:julia@organicfarmersassociation) to get connected!)
- [Crop Insurance for Organics: A Short Course](#) from our colleagues at the Organic Agronomy Training Service (OATS)
- [The Center for Rural Affairs](#) covers a range of crop insurance topics and features a variety of resources
- The Land Stewardship Project has long worked to improve crop insurance and has a variety of resources including this article on [the Crop Insurance Conundrum](#)

## CROP INSURANCE SHOULD BE INFORMED BY DATA, EXPERIENCE, AND TECHNICAL EXPERTISE

In order for crop insurance to support currently underserved farmers, information must be gathered regarding how to do better and shared among agencies and RMA staff and agents on the ground.

- USDA's National Agricultural Statistics Service (NASS) and RMA should work together to regularly conduct an organic production survey. This data will help inform crop insurance practices and needs.
- Expand the USDA's Natural Resources Conservation Service (NRCS) technical capacity and cooperative agreements to support adoption of soil health plans. Soil health efforts should go hand-in-hand with crop insurance support.

- Require organic literacy within RMA to help employees and agents be informed about organic insurance in order to better serve organic clients and grow the benefits of the organic industry. Transitioning and organic producers deserve the same level of service their non-organic counterparts receive. RMA needs to inform its staff and provide ongoing training for agents serving organic producers.

Many of these recommendations have been included in two Farm Bill marker bills:

- Insuring Fairness for Family Farmers Act (S. 2421/H.R. 4804), which aims to reform administrative and operation expenses within the crop insurance program, and revise the standard and livestock price reinsurance agreements.
- Crop Insurance for Future Farmers Act (H.R. 3904), which aligns the definition of “beginning farmer” to match most other USDA programs, extending crop and livestock insurance protections to 10 years for new and beginning farmers.

We’re all paying for crop insurance, and it’s up to us to work together to ensure crop insurance works for everyone!

OFA members have long identified crop insurance as a priority and we’re eager to dig into this work and build community around this topic. Look for future opportunities from OFA to work together to identify problems, brainstorm solutions, and amplify farmer voices.

If you’re in OEFFA’s region and would like to get involved in this important work, contact [policy@oeffa.org](mailto:policy@oeffa.org).

*This article was updated and slightly modified from an article published in OEFFA’s newsletter in Spring 2023. We appreciate OEFFA’s leadership on Crop Insurance and thank them for allowing us to reprint with updates.*

## WHO’S TALKING ABOUT CROP INSURANCE IN PREPARATION FOR THE FARM BILL?

These marker bills, ways of floating ideas for inclusion in the giant 2023 Farm Bill legislation, present solutions that could help crop insurance work better.

- Whole Farm Revenue Protection Program Improvement Act of 2023: The purpose of this act is to improve the Whole Farm Revenue Protection Program which is intended to provide crop insurance for more diversified producers.
- Farm Program Integrity Act of 2023: This bill is intended to close loopholes in the various farm payment systems to ensure taxpayers are supporting only those truly “actively engaged in farming.” This bill would create a cap of \$250,000 annually in total commodity support for any single farm operation and would require subsidy recipients to be working farmers that spend at least half of the year in farm operations.
- Insuring Fairness for Family Farmers Act of 2023: This act is intended to reform the current crop insurance policies to incentivize crop insurance agents to provide coverage to small and diversified (specialty crop) farmers by revising the way crop insurance agent commissions are calculated.
- Crop Insurance for Future Farmers Act of 2023: This act would align the definition of “beginning farmer” in the crop insurance programs with other USDA programs which would extend crop insurance protections for beginning farmers to the first 10 years of farming.

**Learn more about the marker bills OFA is tracking that may impact organic farming, and check back regularly for updates as Farm Bill conversations continue in D.C.**

## OFA'S CROP INSURANCE PRIORITIES

OFA farmers have identified several priorities related to Crop Insurance. We will be workshopping these ideas this winter as part of an OFA Crop Insurance working group. Join us to hone these ideas and add yours. We need your help to make crop insurance work for everyone!

OFA supports the following improvements to crop insurance programs:

- Any practice approved in a farmer's Organic System Plan by a USDA-accredited certifying agent as compliant with organic production standards must be recognized and approved as a "Good Farming Practice" as defined by the Risk Management Agency (RMA).
- The development of new crop insurance tools that serve the needs of diversified organic growers serving all types of markets, including direct sales, that have a streamlined application process and prioritize low paperwork burden.
- Allowing organic farmers to use organic prices for all federal farmer support programs.
- The development of additional organic price elections for crop insurance coverage, and review of policies that cap Contract Price Addendums at two-times the conventional price election for any specific crop.
- Allowing organic transition producers and beginning farmers to calculate the Actual Production History Yield (APH) for new acres or acres under organic transition using the APH of other organic acres on their farm, rather than the county T-Yield for the acres under transition.
- The continuation of Whole-Farm Revenue Protection, established in the 2014 Farm Bill, and recognize the change in farm revenue after a farm has transitioned to organic. Raise the cap to 50% on increased production value under the expansion provision.
- The development of organic price elections for storage loans offered by Farm Service Agency so that producers can access working capital based on the actual value of their crops to cash flow their operations. Utilize existing organic price data developed by RMA to establish storage loan prices.
- Organic farmers must have a crop rotation, which is not currently well supported by Crop Insurance. We need crop insurance coverage, not just in the form of written agreements, for crops besides corn, beans, wheat, and rice. Further, we need a way for organic farmers to be supported, rather than penalized (through the APH system) for enacting a robust and extended rotation both during transition and as organic producers.
- Farmers need a way to manage risk due to genetic and pesticide drift contamination. If these situations could be recognized as a qualifying event for crop insurance, farmers suffering from loss wouldn't be required to identify a source, which isn't always possible. More support from USDA to protect farmers from these types of contamination and to deter the practice of drift is necessary. 🌱



**Julia Barton** is OFA's Farmer Services Director. Before joining the team, Julia Barton worked as the Organic Policy Specialist with OEFFA where she supported farmers transitioning to organic for 9 years. She and her husband run Octagon Acres, an organic vegetable operation and homestead in northeastern Ohio.



# ORGANIC SEED: PROTECT ORGANIC INTEGRITY FROM GMOS

By Harriet Behar

As we wrap up the 2023 crop year, we evaluate what went well and what could have been improved. Weed control, insect and disease pressure, resilience of the crops to dry or excessive weather, overall vigor, and yields are all issues that are affected by the variety and characteristics of the seed planted, as well as how well they grow in your soil type and overall climate. Plans for buying next year's seed start soon, especially to obtain the prized organic varieties for your region.

As genetic engineering becomes more and more dominant in nonorganic agriculture, and the regulatory system overseeing GMOs becomes weaker, it will become more difficult to keep genetically altered seeds out of organic, especially when producers plant nonorganic seed. In the European Union, there are now certain crops that are obligated to be grown from organic seed, in order to be sold as organic.

With more genetic engineering in nonorganic seed occurring, organic growers in the United States and Canada will need to aggressively increase their use of organic seed over the next few years. Performing on-farm seed trials is an important step to discovering which organic seeds have the characteristics needed for your farm. This also indicates a need for more participatory research in organic seed testing and breeding.

In May 2020, the USDA's APHIS agency published the SECURE rule (Sustainable, Ecological, Consistent, Uniform, Responsible Efficient). APHIS (Animal and Plant Health Inspection Service) oversees biotechnology within agriculture. This new rule focuses on the seed or organism's properties and not the method used to produce that seed or organism. This was done to reduce the regulatory burden on the biotech developers.

This rule will not regulate nor require disclosure on the method of seed development if the seed developer declares: 1) the seed will not be considered a plant pest, or 2) if the seed could have been produced through hybridization or the natural process of mutation. APHIS will still regulate when DNA is passed between two different organisms.

However, gene-editing technologies like CRISPR are not traceable or trackable since there is no marker to test if gene-editing occurred. These types of gene-editing technologies do not introduce new DNA, they just modify what is in the original organism. This same deregulation has been done in Canada. At the time of this article, the only gene-edited seed available in the U.S. is mustard greens, but corn, soybeans, rice, wheat, and more are in the pipeline and could be introduced within the coming months.

## **RECOGNIZING CRISPR AS GENETIC ENGINEERING**

The National Organic Standards Board has recommended that the National Organic Program specifically recognize CRISPR as genetic engineering, and therefore be excluded from use in organic production. This recommendation has not been addressed by the NOP. Currently, university research in process has shown some unintended chromosomal damage and mutations when genes are edited, shattering the biotech developer's assurance that this technology is very precise and safe. It appears that without change to the SECURE rule, the only option organic producers have to avoid gene-edited seeds, is to use organic seeds.

The U.S. requirement that organic seed be used unless the equivalent variety is not commercially available in the quality and quantity desired was somewhat influenced by the European Union's organic requirement to use organic seed. In 2021, the EU strengthened this aspect of their organic regulations.



The seed requirements now allow each individual EU country to determine which organic seeds (by species) are sufficiently available in their own country and to mandate organic seed use for those species. Belgium, Denmark, France, Germany, Luxembourg, Holland, and Switzerland all have numerous listings. The EU and U.S. have an organic equivalency agreement that allows free market movement of organic products. This agreement is periodically reviewed. The recent EU strengthening of organic seed requirements might be a reason for the U.S. to adopt something similar in the near future.

Implementing the organic seed requirement in the U.S. has had some successes, but organic seed is not universally used, even if there is sufficient supply for equivalent varieties to the nonorganic varieties planted. Farmers do not want to risk their livelihood and their crop yields on an unknown variety. The higher price of organic seed is not one of the allowed exemptions for not using organic seed, but does affect the volume of organic seed purchased. Farmers have loyalty to local seed suppliers and many of these do not carry organic seeds. With the impending risk of biotech gene-edited seeds leaking into organic agriculture due to the lack of regulation and traceability of these nonorganic seeds, the use of organic seed on certified organic land becomes much more important to protecting the integrity of the organic label in the marketplace. Organic consumers have made it very clear that they do not want GMOs in organic.

## SAVING AND BREEDING DIVERSE SEEDS

The quality and quantity of organic seed varieties has grown over the past decade. For some farmers, growing organic seed provides another income stream and makes regionally adapted seeds available to other organic growers. The Organic Seed Alliance has numerous publications and webinars on how to save your own seed, as well as how to develop your own seed varieties.

Organic seed breeders take into account that there may be more weed pressure in an organic system, so they build in characteristics to deal with that situation. The seeds they select grow well using slow-release natural fertilizers, rather than the quick release soluble fertility inputs used in nonorganic agriculture. Since organic seed breeders are typically smaller, family-run businesses, they are more responsive to new traits they include and encourage feedback from growers using their seed. By supporting these smaller businesses, you are protecting the open sharing of diverse genetic material for continuous improvement, versus the dominant seed businesses who patent and do not share their genetics with others.

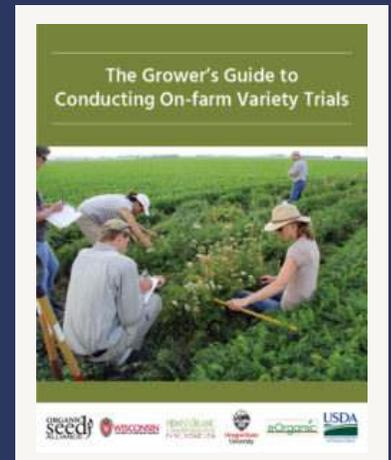
The organic community is facing a crossroads where genetic engineering is posing a risk to organic integrity and trust in the organic label. The investment that organic growers make in using organic seed helps to promote quality and quantity of organic seed available to all. It is unknown yet if the US will move towards obligating some types of organic seed, similar to the EU. The more organic seed you have trialed and determined works well for you, the more ready you will be for possible future regulatory changes, as well as protecting your crop from unwanted genetic engineering. 🌱



Harriet Behar, OFA's Farmer Services Consultant, has been involved with federal, state, and local policy advocacy for over 30 years. She runs organic Sweet Springs Farm in Gays Mills, WI.

## READY TO START SEED TRIALS?

Addressing the need to do on-farm organic seed trials to determine which varieties work well for you is covered in the [Organic Seed Alliance booklet: The Grower's Guide to Conducting On-Farm Variety Trials](#).



This publication goes into great depth on helping you determine what characteristics you're looking for, how to optimize the growing area so the trials are equal between varieties, and prioritizing yearly trials.

There are worksheets to help you document variety performance throughout the season. For larger acres of field crops, planting an acre or two of the organic variety in the middle of your field is much better than choosing the poor ground in a different field. Replicating the trial over a few years will inform you of the resiliency of the varieties over a variety of climatic conditions and management methods.

When evaluating the trial, many factors are important: quality, taste, yield, as well as pest and disease resistance and characteristics such as leaf canopy for controlling weeds. Some traits, like a hairy leaf on alfalfa, can deter leafhopper feeding. Look for characteristics you need, and trial a few to see which ones give you the best options. Many organic growers who did organic seed trialing on their farms told OFA they found the organic varieties superior to the nonorganic varieties they had been using.

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# MAKING THE FARM BILL WORK FOR ORGANIC DAIRY PRODUCERS

Organic milk is the top selling organic commodity in the United States, bringing in over \$1.6 billion in sales in 2021. Yet, American organic dairy producers are in crisis. For years, the price of organic milk has not covered the cost of organic production. Increasing market consolidation in processing and a shrinking field of buyers paired with inconsistent enforcement of regulations have led to a low pay price for producers who work hard to fight environmental degradation and maintain a local supply of high-quality organic milk.

Recently, dramatic increases in energy and feed costs due to unstable international market forces have further threatened the viability of small and mid-sized producers. In the state of Vermont, 35% of family-owned organic dairy farms have gone out of business since 2016, impacting the surrounding rural communities and local economies built around thriving dairy businesses.

*The upcoming Farm Bill presents an opportunity to provide long-needed support for the organic dairy market, similar to what conventional dairy has received for decades.*

## LONG-NEEDED SUPPORT FOR THE ORGANIC DAIRY MARKET

For the past year, Organic Farmers Association has facilitated a working group of organic dairy farmers and producer groups representing the major organic dairy producing regions of the country in weekly meetings to develop policy solutions focused on making the organic dairy industry more sustainable and to support producers farming with integrity.

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With the recommendations from these coast-to-coast farmers, Organic Farmers Association is advocating for policy changes in Congress to support a future in organic dairy farming.

In October, those efforts paid off and Senator Welch (D-VT) introduced the O DAIRY Act that aims to provide improved data collection, investments in regional infrastructure for organic dairy producers, and to set the wheels in motion for a functioning safety net program for organic dairy producers.

Download the issue fact sheet on the bill and read the full bill for more details.

## PRODUCERS SUPPORT THE BILL

"This bill will provide for the collection of organic dairy production data—the same type of data that has long been compiled for conventional dairy", says Kathie Arnold, a co-owner/operator of Twin Oaks Dairy LLC in Truxton, NY that has been producing organic milk for 25 years. "The data is as essential for organic dairy as it is for conventional in providing a basis for good decision-making and policy development." Arnold also states that "a lack of adequate processing facilities has caused a loss of markets for organic dairy farms in some regions of the country and this bill will provide support for additional processing capacity. Without sufficient processing plants, organic dairy farmer's milk cannot reach the consumer." 

Lillian Hawkins is Policy Director of Organic Farmers Association. She ensures the policy priorities of certified organic farmers are represented in Washington, D.C.



By Harriet Behar

The long-awaited final animal welfare rule for mammalian and avian livestock, the Organic Livestock and Poultry Standards (OLPS) rule, was printed in the Federal Register on Thursday, November 2, 2023. This rule has taken over a decade to bring to the finish line with many hundreds of hours of discussion and thousands of written public comments. For many small and mid-sized farms and ranches, there will not be many changes required to comply with the new regulation, but for larger scale poultry, dairy, beef, and swine there are some significant changes.

This rule clearly states that poultry must go outdoors into areas that are at least 75% soil with vegetative covering appropriate to the season and climate. Continuous confinement of poultry indoors is prohibited. The use of porches as “outdoor access” is now clearly prohibited from being considered “outdoors” unless the porch is not enclosed and the birds have access year round to the soil and vegetated area. The USDA states that currently 70% of the organic poultry in the U.S. do not have adequate outdoor access, and have been meeting the regulations through enclosed porches, with no access to the ground, as their outdoor access. This new rule will bring much needed clarity to the outdoor access requirement and consistency to the organic poultry industry, providing consumers what they expect from organic regardless of scale.

## Poultry Animal Welfare Clarifications

The rule also clarifies and defines indoor and outdoor stocking rates for various types of poultry. This clarity will make it easier for organic certifiers to audit and verify appropriate stocking density.

- There must be at least one linear foot of exit doors in a poultry house for every 350 birds.
- Ammonia in hen houses can't exceed 20 PPM, it must be monitored weekly at the height of the bird's head.
- Birds must have open doors to go outside when the temperatures are between 32 and 90 degrees.

- Beak trimming is narrowly defined and allowed, but debeaking, dubbing (removing wattles and combs), desnooding (removal of the turkey snood) and other physical alterations on poultry have been clearly prohibited.

## Animal Welfare Clarifications

For all types of mammals and poultry, this new regulation makes it clear that:

- Continuous confinement of any animal indoors is prohibited.
- Continuous confinement of ruminants in yards, feeding pads, or feedlots is prohibited.
- The pasture regulation is clarified, requiring ruminants must be out on pasture when seasonally appropriate, obtaining 30% of their nutrition from grazing.
- Humane euthanasia is described and required.
- Physical alterations such as cattle tail docking, wattling, and mulesing (removal of skin from the buttocks of sheep) are prohibited.

Many, but not all of the comments made by the Organic Farmers Association were incorporated into the final rule. Unfortunately, the definition of soil and the various methods to be used to maintain vegetation in the outdoor areas was not incorporated. More detailed requirements for swine covering indoor and outdoor stocking rates, ammonia testing, use of artificial light, and use of management techniques to avoid physical alterations such as tail docking were not included.

The Organic Farmers Association applauds that the USDA requires implementation of this rule to be within one year from November 2, 2023. This includes compliance with the outdoor access and exit door requirements for poultry. In the proposed rule, the USDA had offered a variety of implementation dates, with 15 years as one of the options. While OFA preferred a 3-year implementation for existing operations concerning poultry outdoor access, 5 years is a much better choice than 15 years.



# A Review of the Fall NOSB Meeting

By Harriet Behar

The National Organic Standards Board (NOSB) was designed to include the voices of many stakeholders, including public input, with an emphasis on being responsive to the needs of organic farmers. The National Organic Standards Board meetings, which happen twice each year, need strong organic farmer representation to keep the program rooted in the realities you face on your farm or ranch. As the organic movement matures, there are powerful corporate interests that seek to build in loopholes and at times, make it difficult for family-scale farmers to remain viable. Organic farmers are by far the largest constituency of certified organic producers in the U.S. (69% of U.S. certified operations are farms), but are a very small percentage of those who seek to influence the regulations through public comments.

## THE PROCESS

At the recent NOSB October meeting, there were two public comment webinars through Zoom, and three days of in-person NOSB meetings in Rhode Island where the Board discussed public input and voted on numerous proposals.

The comments and NOSB discussions culminate with a formal recommendation to the National Organic Program (NOP) and eventually end up as regulation. It's very interesting to hear the various viewpoints

and influences that go into these discussions that affect what materials you can use for fertility or pest control, as well as the methods of production mandated by the rules. The NOSB has a unique place among USDA advisory boards. For example, no material can be approved or denied use in organic production, unless it has been reviewed and voted upon by the NOSB. Under the "sunset" provision in the organic law, every material on the National List must be reviewed and approved to remain on the list every five years. The NOP cannot put new materials on the National List without this NOSB review and approval.

## ORAL COMMENTS SUMMARY

Two items not on the NOSB agenda did have a significant amount of written and oral comments with no specific path determined at this meeting for fixing these issues. Inerts used in pesticide formulations are currently allowed, but the National List refers to an obsolete EPA list. The NOSB and NOP have struggled for over a decade to determine a better method for allowing more than 130 "inert" materials on organic land, some more benign than others. In addition, there were also numerous comments from consumers, asking the NOP to stop allowing hydroponic production to carry the organic label.

The Organic Farmers Association, as well as other organic groups, agree that hydroponic production should not be labeled as organic. It is inconsistent with the Organic Foods Production Act and ignores many of the requirements soil-based organic farmers must follow.

## PROVIDENCE, RI MEETING OF THE BOARD

The meeting started with two discussions of interest to organic producers. First, numerous groups in the Northeast who are funded under the USDA's Transition to Organic Partnership Program (TOPP) gave reports on their many activities to grow the pool of organic farmers across the Northeast. Second, a good conversation between NOSB members and the Risk Management Agency explored a variety of crop insurance improvements recognizing the unique challenges faced by organic farmers.

## MATERIALS FOR ORGANIC USE

Livestock Materials: The materials on the **livestock list were all reapproved for 5 years**. During the discussion on vaccines, the NOSB made it clear that GMO vaccines are included in the re-approval of vaccines for the National List. This is the one exception for Excluded Methods allowed in organic because vaccines are important for animal health and the broad majority of vaccines on the market use genetically engineered technology. It was acknowledged that certifiers vary in their interpretation of whether phosphoric acid needs to be rinsed after use in dairy operations, and the NOSB is going to develop a system to review and improve annotations in the coming months.

Crops Materials: The crops subcommittee voted to **keep all materials up for sunset review on the National List**. Two items with significant discussion were paper and plastic mulches: paper for mulch and compost feedstocks and plastic for mulch and coverings. Many papers now contain plastic. Leaching of PFAS and phthalates into soil is a concern, as well as microplastics contaminating soil and water.

The Board expressed concern of the long-term sustainability of plastics such as: reliance on fossil fuels for manufacture, soil erosion issues, microplastics in soil and water, and single-season plastic covers and mulches filling up landfills. The Board also discussed the multiple benefits plastics provide, and the challenges of finding economical alternatives. In the end, the NOSB voted to continue to allow both paper and plastic mulch, and keep these materials on the National List. Other materials under sunset review that were voted to relist for another five years include: alcohols, newspaper, sulfurs, lime, and liquid fish products.

Processing/Handling Materials: There were no changes to handling materials on the National List; all materials under sunset were voted to be relisted for another five years.

## RESIDUE TESTING

The Board discussed where in the supply chain and how much pesticide residue testing should be done on organic crops. They discussed the importance of continued support for organic transition and how that needs to be matched with efforts to grow the organic markets. Final proposals on those two areas are due in the spring.

## GPS FIELD/PARCEL COORDINATES

Based on feedback from oral and written comments, the NOSB modified the proposal mandating GPS coordinates for all farm and facility locations in organic system plans to allow certifiers to use a variety of different methods for identification; they passed the amended recommendation.



## NEW & FUTURE NOSB WORK AGENDA ITEMS

Compost & Compost Feedstocks: Two items have been added to the NOSB work agenda. The crops subcommittee will be reviewing the definition of compost and compost feedstocks. The prescriptive nature of the current rule can be a barrier to some and compost feedstocks are not clearly defined.

Inerts: The NOSB will continue working with the public comments and the NOP to address inerts present in pesticide formulations used on organic crops and land. Without the EPA providing this analysis of inerts, it is difficult to identify how to tackle this issue.

Annotations: The Board committed to working with the NOP to develop a better mechanism to address the need to add, remove, or change annotations to items on the National List. At this time, these annotations cannot be changed when the material is being reviewed for sunset, and the NOSB would like to develop a way to allow the change when the Board and public are giving these materials a higher degree of scrutiny than at other times.

Organic Animal Welfare Criteria for Swine: The final Organic Livestock & Poultry Standards Rule (OLPS) that was announced on Wednesday, October 25 at the meeting, failed to address animal welfare standards for swine. OFA and other advocacy groups identified that this animal group was left out of the organic animal welfare standards, and some organic swine producers participate in additional animal welfare standards to supplement their organic certification.

The Board discussed whether or not to add organic swine production to their work agenda as requested by OFA. They seemed unsure if there was a market for organic pork, and did not feel this was a priority.

All of the proposals and discussion documents from all NOSB meetings are posted online.

United States Department of Agriculture  
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National Organic Program  
Transition to Organic Partnership Program



## LET YOUR VOICE BE HEARD!

Farmer voices are important to the NOSB process! It's easy to testify to the NOSB, and OFA can help you bring your on-farm concerns to the volunteer board working for you!

**THE BASICS:** Oral comments are no more than 3 minutes (1 page written) and shared via Zoom. You can give your testimony from the field, tractor, or at home.

**REGISTER:** About 6-8 weeks ahead of the meeting you must register to testify. Visit the [NOSB Meetings page](#) to register and indicate your availability.

**SCHEDULE:** The NOSB will send a schedule prior to the meeting with your approximate 3 minute time slot. OFA will have staff on the call, so if you are not able to listen the whole time, we can let you know when it's almost your turn.

**PRACTICE:** Practice your comments out loud ahead of time to make sure you come in under 3 minutes and sound clear and confident.

**QUESTIONS:** The Board likes to ask farmers questions, so be prepared to answer questions based on your experience. This is a great way to give more than 3 minutes of input. OFA can help you prepare!

OFA's Farmer Services Team is here to support you. We'd be happy to talk with you about your ideas and concerns, and how to give effective public comment at the upcoming spring meeting.

Please call the Farmer HelpLine at **1-833-724-3834**, or email Farmer Services Director Julia Barton at [julia@organicfarmersassociation.org](mailto:julia@organicfarmersassociation.org) for more information or to get involved.

Harriet Behar is OFA's Farmer Services Consultant. She has been involved with federal, state, and local policy advocacy for over 30 years. She runs organic Sweet Springs Farm in Gays Mills, Wisconsin.

