

August 21, 2025
The Honorable Brooke L. Rollins
Secretary
United States Department of Agriculture
1400 Independence Ave, S.W.
Washington, D.C. 20250

RE: Concerns with USDA Reorganization Impact on 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.

Earlier this year, OFA, Organic Trade Association, and National Organic Coalition, delivered a <u>joint letter</u> signed by over 1,300 organic stakeholders, including 942 certified organic farms, urging Agriculture Secretary Brooke Rollins to support the National Organic Program and preserve ilts workforce. We write today in response to the recently announced reorganization of USDA Staff, with specific concerns outlined below:

We cannot afford to lose further NOP staff and institutional knowledge. NOP staff bring years of specialized expertise in organic regulations, compliance, and enforcement. If this reorganization results in staff departures, we risk losing irreplaceable institutional knowledge that underpins the credibility of the organic label. USDA Organic is a more than \$70 billion industry, and the NOP team delivers exceptional value—ensuring marketplace integrity, enforcing rigorous standards, and safeguarding consumer trust with a remarkably small budget relative to the size of the sector. This is one of USDA's best returns on investment, and training new hires in these complex systems would take years, during which enforcement and policy work would suffer.

Face-to-face engagement in D.C. is vital. During OFA fly-ins and advocacy days, organic farmers travel to Washington, D.C., to meet directly with USDA staff. These

meetings allow NOP to coordinate with farmers producing a huge range of agricultural commodities all around the country at the same time. Moving NOP leadership and core staff away from D.C. will make it logistically more difficult for farmers to meet with the people who enforce and uphold organic standards. Without this in-person contact, USDA will be less equipped to address the real-world needs of organic farms and businesses.

Most NOP staff are already field-based. The NOP employees who are currently based in D.C. provide essential coordination, policy, and interagency functions. Further dispersing this already limited D.C. team risks fragmenting communication, slowing decision-making, and weakening oversight at the national level.

Collaboration with other agencies is essential to protecting organic integrity. NOP's ability to protect organic integrity depends on close, ongoing partnerships with other federal agencies. One example is the partnership with U.S. Customs and Border Protection (CBP) to prevent fraud at ports of entry. This partnership is so important that NOP has a staff member physically embedded within CBP to access sensitive information, such as ship manifests and data on fraudulent actors in international trade, and to coordinate directly with CBP personnel to stop fraudulent organic imports before they enter U.S. markets. Beyond CBP, NOP works closely with other USDA agencies—including the Farm Service Agency (FSA), the Natural Resources Conservation Service (NRCS), and the Risk Management Agency (RMA)—to coordinate with broader USDA programs that support U.S. farms and businesses. Reducing the number of NOP staff in Washington, D.C. would make these interagency connections harder to maintain, undermining both enforcement and farmer access to essential USDA resources.

Beyond organic, this reorganization could also jeopardize USDA's essential research functions and disrupt critical services that farmers across all sectors rely on.

We urge you to immediately pause implementation of this reorganization plan to ensure that U.S. farms and businesses—including certified organic operations—retain the tools, staffing, and resources they need to thrive.

Sincerely,

Kate Mendenhall

OFA Executive Director & Organic Farmer