



March 30, 2017

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2642-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-16-0100

RE: Certification, Accreditation, and Compliance Subcommittee – Eliminating the Incentive to Convert Native Ecosystems to Organic Production (Discussion Document)

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Certification, Accreditation, and Compliance Subcommittee's (CACS) discussion document on Eliminating the Incentive to Convert Native Ecosystems to Organic Production.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

We support CACS' efforts to eliminate the incentive to convert native ecosystems to organic production. The three-year transition period is challenging to producers currently farming conventionally, and the allure of bringing new land into agriculture that automatically qualifies for organic status and organic premiums can quickly outweigh the conservation value of native woodlots, sagebrush, grasslands, and tropical rainforests. The growth in organic demand should not be driving a widespread trend to convert native ecosystems in the name of short-term profits.

Laws and Regulations

Eliminating this incentive, however, is extremely challenging, and it is rooted in the law and regulations governing the organic label. We cannot require additional time for transition under any circumstance without an act of Congress to amend the Organic Foods Production Act and the USDA engaging in notice and comment rulemaking to amend the organic regulations. USDA could develop guidance that discourages conversion of native lands to organic production, but guidance cannot be enforced like laws and regulations.

Data

In order to appreciate how large a concern the conversion of native lands to organic production is, OTA believes that accurate and comprehensive data be collected by USDA. CACS should recommend that USDA's National Agricultural Statistics Service include questions relating to the conversion of native

habitat to organic production in its organic producer surveys. Collection of accurate and non-anecdotal data will assist CACS in assessing how much land and what types of land are converted from native ecosystems to organic production allowing for more targeted recommendations for reducing this practice.

Transition Support

CACS clearly understands that the incentive to convert native lands to organic production is due largely to the financial burden producers shoulder when they decide to convert their farms to organic. We encourage CACS also to consider ways that USDA could better support farmers through transition and increase the incentive to convert currently farmed land, rather than native land, to organic. For example, CACS could recommend further aligning the farming practices identified as meeting organic biodiversity requirements (e.g. cover cropping, crop rotation, nutrient management) with those practices eligible for financial support from NRCS through its Conservation Stewardship Program. Small steps to support farmers transitioning land from conventional production to organic can go a long way in reducing the incentive to convert natural ecosystems.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,



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Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association