



October 7, 2014

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket: AMS-NOP-14-0063**

**RE: Materials Subcommittee - Research Priorities and Organic representation on USDA Research Boards**

Dear Ms. Arsenault:

Thank you very much for this opportunity to provide comments on the Materials Subcommittee proposal on Research Priorities for 2014.

The Organic Center is a non-profit organization with the mission of convening credible, evidence-based science on the environmental and health benefits of organic food and farming and communicating them to the public. We are a leading voice in the area of scientific research about organic food and farming, and cover up-to-date studies on sustainable agriculture and health while collaborating with academic and governmental institutions to fill knowledge gaps.

The Organic Center is actively involved in conducting and communicating research on many of the issues that are being identified as research priorities and we expect the prioritization of these topics by NOSB may help us secure further funding.

A critical move that will heavily influence our ability to defend and solicit funds for research that benefits organic production and handling is making sure that we have organic representation on USDA research boards and committees. Therefore, **TOC is requesting that NOSB draft a letter to USDA requesting mandatory organic representation on USDA research boards and committees.** Organic representation can ensure that the organic sector's interests and research needs are adequately and fairly represented.

For example, the Organic Trade Association recently garnered support for an organic citrus producer from Florida and an organic citrus grower from California to serve on the National Agricultural Research, Extension, Education, and Economics (NAREEE) Advisory Board Citrus Disease Subcommittee. The purpose of the committee is to advise the Secretary of Agriculture on citrus research, extension, and development needs, engage in regular consultation and collaboration with USDA and other organizations involved in citrus, and provide recommendations for research and extension activities related to citrus disease.

To the best of our knowledge, the existing subcommittee does not include organic industry representation. Organic representation, however, will be critical in creating a balanced and



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technically adept subcommittee, and will benefit the research development needs for both organic and conventional citrus production alike.

Thinking along these lines, the organic sector must ensure that all USDA appointed research boards include at least one member representing the interests of organic. The Organic Center believes the “Departmental Guidance on Organic Agriculture” released in May 2013 provides the perfect avenue for NOSB to submit such a request to USDA. See Appendix A.

Under the actions listed to implement guidance instructing Agencies, their Under Secretaries, and Administrators to recognize the distinct nature of USDA-certified organic production and organic goods, the following action is listed:

Where the organic sector has specific research needs regarding production or regulatory compliance, the Department will endeavor to respond to those specific needs. The Department should include organic production as a component of its studies comparing the effects of different production systems when appropriate (e.g., investigation of climate change adaptation practices). Organic production models may provide alternative solutions to current agricultural challenges, and it is the Agency’s responsibility to develop diversity in research and alternatives for all producers.

The Organic Center encourages NOSB to take this opportunity to request that organic representation be a requirement of any USDA board or committee.

The Organic Center is continually collecting information on research needs from multiple sectors of the organic community. We conduct industry roundtables, work with the Organic Trade Association’s Farmers Advisory Council, meet with professors on our Science Advisory board and hold one-on-one meetings with individual companies, farmers, professors, and consumers. We would like to offer ourselves as a resource to the NOSB Materials Subcommittee, especially in the area of research priorities.

Please do not hesitate to contact us for information on the data that we have been collecting or with questions you would like us to pose the research community.

Again, on behalf of The Organic Center, I would like to extend my thanks to the Materials Subcommittee for your commitment to furthering organic agriculture.

Respectfully submitted,

Jessica Shade  
Director of Science Programs  
The Organic Center



United States Department of Agriculture

Office of the Secretary  
Washington, D.C. 20250

**USDA DEPARTMENTAL GUIDANCE ON ORGANIC AGRICULTURE,  
MARKETING AND INDUSTRY  
May 2013**

**I. Purpose**

To provide the U.S. Department of Agriculture (USDA) agencies with Departmental guidance regarding the following:

- A. The application of their programs and policies to producers and handlers of organic agricultural products produced in accordance with the USDA's National Organic Program (NOP);
- B. Responsibilities for reporting and representation with respect to Departmental goals for organic agriculture;
- C. Cross-recognition of certification regarding agency requirements that overlap with provisions of the NOP.

**II. Background**

USDA is responsible, under the Organic Foods Production Act of 1990 (OFPA)(7 U.S.C. 6501-6522), for establishing national standards for organic production and marketing, for assuring consumers that organically produced products meet those standards, and for facilitating commerce in organically produced products. In addition to the unique regulatory system designed by OFPA, Congress has provided for distinct treatment of organic agriculture through the establishment of dedicated programs and policies for the following: research and education; data collection; risk management analysis; and conservation activities. Certified organic goods are also the specific subject of several international trade agreements.

Through the NOP, USDA has helped farmers and businesses create an industry that today encompasses over 17,000 organic businesses in the United States, and has grown to \$35 billion in U.S. retail sales over 22 years, at an average growth rate of 16 percent. When viewed as a distinct category, organic ranks fourth in U.S. food/feed crop production at farm-gate values<sup>1</sup>.

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<sup>1</sup>Crop Values 2007 Summary Agricultural Statistics Board February 2008, NASS, USDA 2007 Census of Agriculture; 2008 Organic Producers Survey, NASS, USDA – Certified and Exempt Data. [#1 Corn, \$52 Billion; #2 Soybeans, \$27.8 Billion; #3 Wheat, \$13.7 Billion; **#4 Organic Production, \$3.2 Billion**; #5 Almonds, \$2.3 Billion.]

This stream of production and commerce is a bright spot in the American marketplace of innovation and entrepreneurship, and particularly can contribute to USDA's goals for rural economic development. In recognition of this potential, the 2010 USDA Strategic Plan called for an increase of 25 percent in certified U.S. organic businesses by 2015<sup>2</sup>.

The scope and rigor of NOP certification needs to be well understood by all USDA programs and agencies. Certification under the National Organic Program includes verification of numerous practices and conditions that correlate with requirements or responsibilities of other USDA programs. For example, organic standards include requirements that are relevant to conservation programs, food safety, risk management, export certifications, etc. As a result of these overlapping requirements, there may be redundant paperwork and fee burdens that can be streamlined or eliminated through cross-agency recognition protocols.

USDA and the organic sector should continue to work together to identify possible improvements within the Department. In order to ensure that USDA provides the tools and services that meet the growing needs of the organic sector and to remove obstacles to continued growth of organic production, the guidance below is issued.

### **III. Guidance**

The Office of the Secretary instructs the Agencies, their Undersecretaries, and Administrators to recognize the distinct nature of USDA-certified organic production and organic goods, review their agencies' actions with respect to the Department's 2010 Strategic Plan - Performance Measure 1.3.1, and take into account the documentation and inspection already required for organic certification for purposes of implementing programs and policies.

The following actions should be taken now to implement this guidance:

- A. Where compliance with an agriculture practice or process is required, and this requirement coincides with provisions of the NOP regulations (7 CFR part 205), all USDA agencies will determine whether a valid USDA-NOP certificate can suffice as third-party verification and proof of compliance;
- B. Where programs require documentation of land or livestock management practices for participation in an agency program, agencies will determine whether the "Organic Systems Plan," verified through the USDA NOP's third-party verification, will satisfy such documentation requirement;
- C. Administrators will review their agency's training goals with respect to the USDA Organic Literacy Initiative and the relevant AgLearn training modules, and ensure fulfillment of those goals;
- D. Administrators should confirm their agency's Point of Contact for the USDA Organic Working Group, which is the Department's internal communications network concerning organic agriculture and markets;

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<sup>2</sup> USDA 2010 Strategic Plan, Performance Measure 1.3.1, p. 10.

- E. In conjunction with the USDA Organic Working Group, Administrators should evaluate and report their actions directed toward achieving the USDA Strategic Plan performance measure 1.3.1 for growth of the organic sector;
- F. Where it is apparent that a lack of organic-specific data impacts decisions, agencies should collaborate on data collection and analysis through the USDA Organic Working Group;
- G. Where the organic sector has specific research needs regarding production or regulatory compliance, the Department will endeavor to respond to those specific needs. The Department should include organic production as a component of its studies comparing the effects of different production systems when appropriate (e.g., investigation of climate change adaptation practices). Organic production models may provide alternative solutions to current agricultural challenges, and it is the Agency's responsibility to develop diversity in research and alternatives for all producers.

#### **IV. Terms of Reference**

- A. Organic Literacy Initiative (OLI). The OLI is a package of training and outreach materials for use by all USDA employees and the public to do the following: 1) learn about the USDA National Organic Program and the role of USDA in organic agriculture; and 2) provide USDA staff with resources they may need to serve organic customers. (See [www.ams.usda.gov/organicinfo](http://www.ams.usda.gov/organicinfo) for more information.)
- B. Organic 101 and 201 AgLearn Training Modules. The goal of these trainings is to help USDA employees better understand the needs of alternative agricultural producers. This understanding will allow employees to make USDA programs and services more accessible and to enable them to connect with appropriate resources. AgLearn offers two training modules on organic agriculture: Organic 101: Introduction to Organic and Organic 201: Intermediate Organic.
- C. The USDA Organic Working Group (OWG). The OWG is an internal communications and collaboration network with representatives from across USDA. The chair of the OWG is Mark Lipson, Organic and Sustainable Agriculture Policy Advisor, OSEC-MRP.

**V. USDA Organic Working Group - Points of Contact**  
(Current as of 8/1/2012)

<b>Agency</b>	<b>Point of Contact</b>	<b>Email</b>	<b>Phone Number</b>
AMS – National Organic Program	Miles McEvoy	Miles.McEvoy@ams.usda.gov	(202) 720-3252
AMS – Market News	Terry Long (Fruit & Vegetable) Barbara Meredith (Cotton) Joe Gaynor (Dairy) Michael Lynch (Livestock & Grain) Michael Sheats (Poultry)	Terry.Long@ams.usda.gov Barbara.Meredith@ams.usda.gov Joseph.Gaynor@ams.usda.gov Michael.Lynch@ams.usda.gov Michael.Sheats@ams.usda.gov	(202) 720-2175 (901) 384-3016 (202) 720-2175 (202) 720-6231 (202) 720-6911
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AMS – FMPP	Carmen Humphrey	Carmen.Humphrey@ams.usda.gov	(202) 720-0933
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CNPP	Elaine McLaughlin	Elaine.McLaughlin@cnpp.usda.gov	(703) 305-2950
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FAS – Trade Access	Kelly Strzelecki	Kelly.Strzelecki@fas.usda.gov	(202) 690-0522
FAS – International Production & Trade Analysis	Andrew Sowell	Andrew.Sowell@fas.usda.gov	(202) 720-0262
FAS – International Marketing Programs	Heather Velthuis	Heather.Velthuis@fas.usda.gov	(202) 720-9792

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FNS – Food Safety	Julie Skolmowski	Julie.Skolmowski@fns.usda.gov	(703) 305-1093
FS	Andy Mason	AMason@fs.fed.us	(202) 205-1694
FSA	William Chambers	William.Chambers@wdc.fsa.gov	(202) 720-3134 Main line: (202) 720-7163
FSIS	Small Plant Help Desk	InfoSource@fsis.usda.gov	1 (877) FSIS-HELP M-F 8 a.m.- 4 p.m. (EST)
GIPSA	Jennifer Hill	Jennifer.S.Hill@gipsa.usda.gov	(202) 720-0226
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ARS-NAL (National Agricultural Library)	Bill Thomas	william.thomas@ars.usda.gov	(301) 504-5724
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