

April 21, 2025

Ms. Michelle Arsenault National Organic Standards Board USDA-AMS-NOP

Docket: AMS-NOP-24-0081

#### RE: Handling Subcommittee 2027 Sunset Handling Substances

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Handling Subcommittee on its 2027 Sunset Handling Substances. 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. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

Each year, OTA conducts surveys of the trade to inform our position on the current year review of National List substances. Surveys are posted online and include a brief description of uses in organic production; the OTA draft position; a brief summary of public comments from the last sunset review; an indication of the Board's vote at last sunset review (unanimous vote to renew, majority vote to renew, or significant vote to remove); and any questions posed by the Subcommittee. Respondents are asked to provide any additional information related to the material, its usage, and compliance with National List criteria, including whether the material should remain listed. For agricultural materials, we ask for any information regarding the availability or history of unavailability in the appropriate form, quality, or quantity of the material as well as any new information on alternative substances.

Based on those surveys, OTA provides the following comments on the 2027 Handling Substances:

#### Kaolin | §205.605(a)

- Uses in organic processing/handling: Used as a filtering agent in juices and as an anti-caking agent.
- **OTA position:** Kaolin currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.



#### Sodium bicarbonate | §205.605(a)

- Uses in organic processing/handling: Also known as baking soda. Used as a leavening agent in baked goods such as cookies, pancakes, and crackers; as an acidity regulator; and as neutralizer in some dairy products.
- **OTA position:** Sodium bicarbonate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

#### Waxes-nonsynthetic (wood rosin) | §205.605

- Uses in organic processing/handling: Used as a fruit wax, primarily in citrus.
- **OTA Position:** Wood rosin currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

#### Ammonium Bicarbonate | §205.605(b) for use only as a leavening agent

- Uses in organic processing/handling: Allowed as a leavening agent and often used to create specific characteristic textures in baked goods. This is the only leavening agent that decomposes into water and gas during the baking process, and by doing so does not impart a flavor to the baked good as sodium bicarbonate might. Because of this unique characteristic there is no organic alternative.
- **OTA Position:** Ammonium bicarbonate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

#### Ammonium Carbonate | §205.605(b) for use only as a leavening agent

- Uses in organic processing/handling: Allowed as a leavening agent and used in baked goods such as cookies, crackers, and breadsticks to make them lighter and crispier. As with the bicarbonate form, this is the only leavening agent that decomposes into water and gas during the baking process, and by doing so does not impart a flavor to the baked good as sodium bicarbonate might. Because of this unique characteristic there is no organic alternative.
- **OTA Position:** Ammonium carbonate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.



#### Calcium Phosphates (monobasic, dibasic, tribasic) | §205.605(b)

- Uses in organic processing/handling: Used as a leavening agent (it's a key component in baking powder) in cookies and cakes, dough conditioner, nutrient, yeast food. Monobasic and dibasic forms are used in reduced sodium baked goods. Monobasic is used as buffer, as a firming agent in canned fruits and vegetables, and as a sequestrant. Tribasic used as anticaking agent, buffer. Dibasic is used enriched flour, noodle products, and dry and cooked breakfast cereals.
- **OTA Position:** Calcium phosphates currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, are necessary for organic production, there are no viable alternatives, and they are consistent with organic handling.

#### Low-acyl gellan gum | §205.605(b)

- Uses in organic processing/handling: Used as an ingredient/base for vegetarian production of capsules for use in supplements and vitamins.
- **OTA Position:** Low-acyl gellan gum currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

#### Ozone | §205.605(b)

- Uses in organic processing/handling: Used as an equipment and produce disinfectant and fumigant to reduce/control microorganisms for food safety purposes.
- **OTA Position:** Ozone currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

### Sodium hydroxide | §205.605(b) prohibited for use in lye peeling of fruits and vegetables

- Uses in organic processing/handling: Used in pretzel manufacturing to create the characteristic dark sheen and flavor, as a processing aid for cocoa manufacturing, for removing bitterness from olives, and as a processing aid in making soaps and body care products.
- **OTA Position:** Sodium hydroxide currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.



#### Carnauba wax | **§205.606**

- Uses in organic processing/handling: Used as a component in coatings for fresh fruit, candy coatings, and a base for chewing gum. It is also used as a releasing agent in manufacturing, and as an ingredient in defoamers.
- **OTA Position:** Carnauba wax currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

### Colors derived from agricultural products | §205.606 must not be produced using synthetic solvents and carrier systems or any artificial preservative

- Beet juice extract color, derived from Beta vulgaris L., except must not be produced from sugarbeets.
- Beta-carotene extract, derived from carrots (Daucus carota L.) or algae (Dunaliella salina).
- Black/purple carrot juice color, derived from Daucus carota L.
- **Chokeberry, aronia juice color,** derived from Aronia arbutifolia (L.) Pers. or Aronia melanocarpa (Michx.) Elliott.
- Elderberry juice color, derived from Sambucus nigra L.
- Grape skin extract color, derived from Vitis vinifera L.
- Purple sweet potato juice color, derived from Ipomoea batatas L. or Solanum tuberosum L.
- Red cabbage extract color, derived from Brassica oleracea L.
- Red radish extract color, derived from Raphanus sativus L.
- Saffron extract color, derived from Crocus sativus L.
- Uses in organic processing/handling: Colors are added to enhance the visual appeal of food, assure color uniformity, and add color back to a food after loss in processing, or to intensify color.
- **OTA Position:** As seen in the last sunset review when 8 color listings were allowed to sunset, organic agricultural alternatives continue to emerge. Some colors may continue to meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, are necessary for organic production, there are no viable alternatives, and they are consistent with organic handling. However, there may be viable alternatives available in organic form.

#### Cornstarch (native) | §205.606

• Uses in organic processing/handling: Allowed for use as ingredient or processing aid. Produced from specific strains of corn, it is used widely as thickener, formulation aid, bulking agent, dilutent,



fluidifying agent, and moisture adsorbing agent, molding starch. Used in baking powder, confectioner's sugar, bulking agent for enzyme preparation and flavorings.

• **OTA Position:** Initial 2025 feedback from OTA members suggests supply of most forms of cornstarch may be sufficient in commercially available quantities to warrant removal from the list. The following forms have been highlighted as being **commercially available in organic** form at this time:

- o Native corn starch (cook-up); different grades of particle size and moisture content available
- o Native pregelatinized (drum dried)
- o Native pregelatinized (spray cooked)
- o Super dried (<6% moisture) and reduced micro load; for personal care & pharma applications
- o Thin boiling; for vegan gelatin replacement in confectionary industry
- o Molding starch
- o Fat replacing options; for spreadable cheese and spreads
- o Functional and clean label (cook up); for organic alternative for chemically modified starches (also freeze thaw stable)
- o Functional and Clean Label (pregelatinized); for low fat mayonnaise (cold process)
- o Corn and waxy corn options
- o Low microbiological load options
- o Various granularity grades (varying particle size)

# Glycerin | §205.606 (CAS # 56-81-5)—produced from agricultural source materials and processed using biological or mechanical/physical methods as described under §205.270(a).

- Uses in organic processing/handling: Used as a binder, humectant, solvent, and carrier. Commonly used in natural flavors and as an alcohol-free alternative to ethanol.
- OTA Position: While comments from the previous review suggested there were no suitable commercially available alternatives, OTA has received a comment suggesting the supply of organic glycerin has grown. A commenter noted that less than 10% of the available capacity of organic glycerin is currently utilized. Information from several suppliers of organic glycerin suggests there is no limitation on raw material to meet demand within a 6-month period.

#### Inulin-oligofructose enriched | §205.606

• Uses in organic processing/handling: A non-digestible carbohydrate used in food (particularly yogurt) to improve calcium bioavailability and absorption, to serve as soluble dietary fiber or a prebiotic ingredient, and to enhance the texture and consistency of the food.



• **OTA Position:** Inulin-oligofructose enriched currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

#### Orange shellac | §205.606

- Uses in organic processing/handling: Used in coating of fruits and vegetables. It is also used as an ingredient in lozenges, capsules and tablets, and as a confectionery glaze on candies.
- **OTA Position:** Orange shellac currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

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,

Scott Rice Sr. Director, Regulatory Affairs Organic Trade Association

cc: Tom Chapman Co-CEO Organic Trade Association



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#### RE: Livestock Subcommittee 2027 Sunset Livestock Substances

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Livestock Subcommittee on its 2027 Sunset Livestock Substances. 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. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

Each year, OTA conducts surveys of the trade to inform our position on the current year review of National List substances. Surveys are posted online and include a brief description of uses in organic production; the OTA draft position; a brief summary of public comments from the last sunset review; an indication of the Board's vote at last sunset review (unanimous vote to renew, majority vote to renew, or significant vote to remove); and any questions posed by the Subcommittee. Respondents are asked to provide any additional information related to the material, its usage, and compliance with National List criteria, including whether the material should remain listed. For agricultural materials, we ask for any information regarding the availability or history of unavailability in the appropriate form, quality, or quantity of the material as well as any new information on alternative substances.

Based on those surveys, OTA provides the following comments on the 2027 Sunset Livestock Substances:



Butorphanol | §205.603 (CAS #-42408-82-2)—federal law restricts this drug to use by or on the lawful written or oral order of a licensed veterinarian, in full compliance with the AMDUCA and 21 CFR part 530 of the Food and Drug Administration regulations. Also, for use under 7 CFR part 205, the NOP requires:

(i)Use by or on the lawful written order of a licensed veterinarian; and

(ii)A meat withdrawal period of at least 42 days after administering to livestock intended for slaughter; and a milk discard period of at least 8 days after administering to dairy animals.

- Uses in organic livestock production: Used as an anesthetic for surgical procedures.
- OTA Position: Butorphanol currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic livestock production.

Flunixin | §205.603 (CAS #-38677-85-9)—in accordance with approved labeling; except that for use under 7 CFR part 205, the NOP requires a withdrawal period of at least two-times that required by the FDA

- Uses in organic livestock production: Used to treat inflammation and pyrexia.
- OTA Position: Flunixin currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic livestock production.

Magnesium hydroxide | §205.603 (CAS #-1309-42-8)—federal law restricts this drug to use by or on the lawful written or oral order of a licensed veterinarian, in full compliance with the AMDUCA and 21 CFR part 530 of the Food and Drug Administration regulations. Also, for use under 7 CFR part 205, the NOP requires use by or on the lawful written order of a licensed veterinarian.

- Uses in organic livestock production: Used as an antacid and laxative.
- OTA Position: Magnesium hydroxide currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic livestock production.

#### Oxytocin |§205.603 use in post parturition therapeutic applications

• Uses in organic livestock production: In nonorganic production, it can be used regularly to help nonorganic dairy cows relax and "let down their milk." In organic production, it is used "in post parturition therapeutic applications," an annotation that some find ambiguous.



• **OTA Position:** Given the Board's recommendation to remove this listing in its last review, based in part on two members with a large presence in the organic dairy sector, OTA is interested in hearing from members regarding the necessity of this substance and its consistency with organic production.

### Poloxalene | §205.603 (CAS #-9003-11-6)—for use under 7 CFR part 205, the NOP requires that poloxalene only be used for the emergency treatment of bloat.

- Uses in organic livestock production: Used as an emergency bloat treatment.
- **OTA Position:** Poloxalene currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic livestock production.

#### Formic acid | §205.603 (CAS # 64-18-6)—for use as a pesticide solely within honeybee hives.

- Uses in organic livestock production: Used to control varroa mites in honeybees.
- **OTA Position:** Formic acid currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic livestock production.

## Sucrose octanoate esters | §205.603 (CAS #s-42922-74-7; 58064-47-4)—in accordance with approved labeling

- Uses in organic livestock production: Used to control varroa mites in honeybees.
- **OTA Position:** Given the Board's recommendation to remove this listing in its last review, OTA is interested in hearing from members if there is a need for this substance, and whether the EPA-registered products containing this substance are in use by organic producers.

EPA List 4 Inerts | §205.603 As synthetic inert ingredients as classified by the Environmental Protection Agency (EPA), for use with nonsynthetic substances or synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances. (1) EPA List 4—Inerts of Minimal Concern.

- Uses in organic livestock production: Used as inactive ingredients formulated with allowed pesticide active ingredients.
- **OTA Position:** OTA has commented extensively on this listing, which references a list no longer maintained by EPA. OTA recognizes the need to determine a solution that allows inert ingredients in pest control products that are vital to organic operations, meet OFPA criteria, and allow for the development of new products to meet the needs of organic operations. OTA generally supports the



recommended rulemaking options voted on at the October 2024 NOSB meeting and looks forward to further work on this from the NOP.

Until there is an alternative to this listing, OTA supports the continued listing to ensure organic operations have the tools essential to their success.

# Excipients | §205.603 only for use in the manufacture of drugs and biologics used to treat organic livestock when the excipient is:

(1) Identified by the FDA as Generally Recognized As Safe;

(2) Approved by the FDA as a food additive;

(3) Included in the FDA review and approval of a New Animal Drug Application or New Drug Application; or

(4) Approved by APHIS for use in veterinary biologics.

- Uses in organic livestock production: Used as inactive ingredients formulated with allowed active medical treatment ingredients.
- **OTA Position:** Excipients currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, they are necessary for organic production, there are no viable alternatives, and they are consistent with organic livestock production.

### Strychnine | §205.604

- Uses in organic livestock production: Prohibited for use in organic production. Strychnine is a toxic alkaloid allowed in conventional agriculture for below-ground use to control pocket gophers.
- OTA Position: OTA supports the continued prohibition of strychnine in organic production.

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,

Scott Rice Sr. Director, Regulatory Affairs Organic Trade Association

cc: Tom Chapman



Co-CEO Organic Trade Association



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#### RE: **Crops Subcommittee** Proposal: Compost, Feedstocks, and the National List **Discussion Document: Compostable Synthetic Food Packaging Plastics and Cellulosic Fiber-Based Materials**

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Crops Subcommittee on its proposal and discussion document relating to the evaluation of compost feedstocks. 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. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

As a cornerstone of organic crop production systems, OTA appreciates the Board's thoughtful consideration of compost and the feedstocks that go into its production. As we noted in our fall 2024 comments, OTA supports the Subcommittee's proposal unanimously passed at that meeting to amend the practice standard. As we also noted in our comments in the fall, we do not take a position on the Subcommittee's approach to the evaluation of synthetic feedstocks in compost, however we understand the Subcommittee's desire to evaluate synthetic feedstocks consistent with the existing National List evaluation process.

We support the Subcommittee's current work to better understand and evaluate the suitability of compostable polymers and look forward to reviewing the forthcoming technical report (TR) on resins and formulated products that meet specific ASTM standards. As the Subcommittee continues its review, we reiterate our suggestion from the fall that it also address the wide use of noncompostable plastics, as used in plastic mulch film, and the potential for alternatives to these mulches such as biodegradable biobased mulch.

While mulch presents an opportunity in the field, organic consumer preferences are pointing to similar opportunities in the produce and grocery aisles. We'd like to share some fresh insights from our recent Organic Market Report, an annual survey of industry members to understand trends in the organic



marketplace. This year, we queried members on several aspects of sustainability which demonstrate the increasing requests to see less plastic in consumers' baskets. When asked "In what areas of sustainability are retailers (or other direct customers) asking for you to take action?" respondents put packaging sustainability at the top of the list.

#### **Requested Sustainability Parameters**



When asked "How much more valuable would organic certification be to your organization if it could also be used to verify more of these sustainability requests?" over 2/3 respondents noted they would find certification either somewhat or significantly more valuable and over 85% would see added value.



Increased Value of Organic If Meeting Sustainability Requests

Source: Organic Trade Association's 2025 Organic Market Survey conducted 10/31/2024-1/27/2025. Q: "How much more valuable would organic certification be to your organization if it could also be used to verify more of these sustainability requests?"



When asked "What specific retailer/customer requests have you received or what actions has your company taken to address packaging sustainability requests?" respondents rated highly the use of compostable packaging as well as the elimination of plastic.



#### **Packaging Sustainability Requests**

Source: Organic Trade Association's 2025 Organic Market Survey conducted 10/31/2024–1/27/2025. Q: "What specific retailer/customer requests have you received or what actions has your company taken to address packaging sustainability requests? (Select all that apply)"

We know consumers place value on the organic brand and are now clearly expressing an interest in addressing other sustainability goals. While organic may not be able to meet every consumer expectation, there is real opportunity it can embrace some of these sustainability goals if we find substances that align with our common organic vision. Creating a dichotomy between organic certification and sustainable packaging will create headwinds for growing the organic marketplace and organic adoption by sustainability minded consumers. Organic—and conventional—production relies on tremendous amounts of nonbiodegradable, unrecyclable plastics in the field as well as in packaging. Organic has indicated a desire to move beyond this reliance by placing in the regulation an allowance for biodegradable biobased mulch, referencing some of the same or similar ASTM standards for degradability as will be evaluated in the coming TR.

However, no commercially available mulches exist that meet the requirements of the regulation, and we see continued use of nonbiodegradable plastic mulches. While these are required to be removed from the field at the end of the growing or harvest season before they can degrade, weather, exposure and the practicalities of farm machinery and movement in the field see some of this degrade before it can be removed.

While we may be uncomfortable with some biodegradable synthetics, we must ask to what degree are we comfortable with the continued use of nonbiodegradable plastics and synthetic microplastics that don't break down at all. Perfect solutions are rare, and tradeoff decisions must be made in the context of



real-world challenges, not theoretical protocols. Synthetic contamination of farms can occur through various practical avenues, such as poorly maintained equipment, inadvertent water contamination, or inadvertent litter.

With current composting standards, the physical removal of plastics from waste streams is unlikely to be completely effective. The Subcommittee is taking positive strides to address some of these concerns as they relate to compost with its distinction of contamination as that which can be removed from compost feedstocks, and unavoidable residual environmental contamination (UREC) as that which cannot be avoided. As a community we have accepted some of these small compromises and recognize organic does not exist in a "pure" environment.

While taking into consideration the findings of the forthcoming TR and through its deliberations as it considers the types of biodegradable plastics that might be acceptable in organic production, we encourage the board to challenge itself to explore the relative sustainability of real-world tradeoffs and the collective impact of not engaging in the efforts to reduce the reliance on plastics.

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,

Scott Rice Sr. Director, Regulatory Affairs Organic Trade Association

cc: Tom Chapman Co-CEO **Organic Trade Association** 



April 21, 2025

Ms. Michelle Arsenault National Organic Standards Board USDA-AMS-NOP

Docket: AMS-NOP-24-0081

#### RE: **Certification, Accreditation, and Compliance Subcommittee** Proposal: Residue Testing for a Global Supply Chain Proposal **Discussion Document: Regulation Review**

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Certification, Accreditation, and Compliance Subcommittee on its proposal to update National Organic Program guidance documents related to residue testing, and its discussion document on related regulation review. 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. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

#### **Residue Testing for a Global Supply Chain: Proposal**

OTA supports the Subcommittee's proposal to update the foundational residue testing guidance and training documents. As noted in the proposal, the organic industry has evolved in the time since these guidance documents were created, as has the need to refine the use and focus of testing as a tool. In recommending updates through its public and participatory process the Board helps drive consistency in sampling and testing practices, key to ensuring an even playing field for organic businesses.

OTA has the following comments for each of the respective sections of the proposal document.

#### Sampling Procedures for Residue Sampling (NOP 2610)

OTA is highly supportive of a risk-based approach, as noted in Section 5b, when determining what to sample and where to do so in the supply chain. The risk-based decision tree suggested later in the document presents an excellent opportunity to align certifiers in this approach. While random sampling may occasionally lead to findings of positive presence of prohibited materials and may act as a disincentive to commit fraud, targeted sampling based on the risk factors included in OILC course NOP-190 presents a more effective use of resources.



We similarly offer strong support of using the question in the training module, "Can I reasonably think that I can determine the source of the contamination and the responsible parties if this sample is positive?" as a guide for when and where to sample. While the factors included in Section 6 (Time is of the Essence) are important guidelines, consideration should also be given before sampling product in long-term storage, particularly if held over from a prior season. Whereas sampling such product may have the utility of detecting prohibited storage materials or issues with commingling, investigating field-applied prohibited substances becomes increasingly difficult as time passes. Such instances can lead to a heavy investment of time and resources of multiple parties with no satisfactory resolution, nor contribution to validating organic integrity.

#### Laboratory Selection Criteria (NOP 2611)

OTA is supportive of updating and expanding this document to reflect testing beyond pesticide residues (prohibited production inputs, synthetic solvents used in oil extraction, and potentially other post-harvest substances).

### Prohibited Pesticides for NOP Residue Testing (NOP 2611-1)

OTA supports the proposed changes, especially the emphasis in Section 1d on the importance of understanding regional and crop-specific differences in pesticide and processing aid use. This highlights the utility of a risk-based approach and a smarter use of resources. To best take advantage of this approach, emphasis also needs to be placed on training in these regional and crop-specific differences so that certifiers can plan for and direct the most appropriate and applicable sampling on a given inspection.

#### Responding to Results (NOP 2613)

Consistency in response to testing results is key to ensuring a fair and even business environment. OTA supports the efforts to remove uncertainty when results show presence of a substance for which there is no EPA tolerance or FDA action level. Similarly, we support resolving inconsistencies in the outcomes of self-reported drift vs. a response to positive residue samples. We also support establishing a common approach or taking advantage of existing approaches when evaluating presence of prohibited substances in dehydrated, extracted, or concentrated organic products. In each of these scenarios, we urge sound and sensible approaches that balance consumer expectations of organic integrity with the reality that organic production is often adjacent to conventional systems.

#### **Consistency in Export Markets**

While ensuring consistency in the domestic market is essential, we see an equal need in export markets. Where possible, OTA encourages the NOP to work with our trading partners to drive similar consistency in response to positive presence of prohibited substances in export markets. Be it lower levels of detection, testing for substances outside the panels used in domestic markets, or greater scrutiny placed on metabolites of prohibited substances, our members have experienced the logistical and financial setbacks of product being excluded from the organic marketplace. In the near term, we see



value in clearly communicating these challenges in a timely manner. In the longer term, there may be an opportunity to evaluate these approaches when renegotiating trade arrangements.

#### Residue Testing for a Global Supply Chain: Regulation Review Discussion Document

#### **Exclusion from organic sale**

OTA supports the Board's further consideration of amending \$205.671 to clarify an intentional application of a prohibited substance or excluded method results in an exclusion from sale as an organic product, regardless of whether a tolerance level is established. As the Board considers this change, we see a potential challenge in balancing a prompt response and exclusion from sale with the necessity of ensuring there is due process in investigating positive residue findings or excluded method presence.

One potential for addressing this challenge is presented in the public comment summary, in which one commenter suggests the use of holding orders. A hold on product for which positive residue or excluded method use is detected would allow for an investigation to be completed, and also presents the opportunity for downstream notification of the supply chain, another potential requirement explored by the Board. Should an amendment to the regulation allowing hold of product be recommended, we suggest there be language as specific as possible as to what party—or parties—bears the responsibility and cost of a hold.

#### Unavoidable residual environmental contamination (UREC) Definition (§205.2)

OTA agrees there may be a need to update how UREC is defined or taken into consideration when responding to positive residue findings or excluded method presence. However, we find the suggested UREC definition revision, which strikes "naturally occurring...chemicals," may unintentionally exclude certain scenarios or findings. For instance, OTA is aware of cases in which test results showing positive presence for phosphonic acid have later been found to originate from levels of phosphorus naturally occurring on an organic production site. In these instances, the UREC finding stems not from background levels of prohibited substances, but from naturally occurring levels. In light of this, we caution the Board in removing the "naturally occurring" text from the definition.

#### Number and Cost of Sampling and Testing (\$205.670)

OTA supports the 5% minimum number of samples as required in §205.670 and sees a benefit in finding opportunities to increase this number if efforts can be focused with a risk-based lens. We further support exploring the option of certifiers having the ability to pass this cost to certified operations. But the terms under which the cost may be passed must be clearly and consistently implemented by certifiers and understood by the trade. We understand certifiers have the latitude to pass costs for follow-up sampling under the terms of a settlement agreement as an outcome of a compliance investigation. In the absence of a change to the regulation, there appears to be opportunity for NOP to clarify the existing regulation and whether or when sampling and testing costs may be passed to an operation.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic



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#### RE: Crops Subcommittee 2027 Sunset Crops Substances

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Crops Subcommittee on its 2027 Sunset Crops Substances. 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. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

Each year, OTA conducts surveys of the trade to inform our position on the current year review of National List substances. Surveys are posted online and include a brief description of uses in organic production; the OTA draft position; a brief summary of public comments from the last sunset review; an indication of the Board's vote at last sunset review (unanimous vote to renew, majority vote to renew, or significant vote to remove); and any questions posed by the Subcommittee. Respondents are asked to provide any additional information related to the material, its usage, and compliance with National List criteria, including whether the material should remain listed. For agricultural materials, we ask for any information regarding the availability or history of unavailability in the appropriate form, quality, or quantity of the material as well as any new information on alternative substances.

Based on those surveys, OTA provides the following comments on the 2027 Sunset Crops Substances:

Potassium hypochlorite | \$205.601(a)(2)—For pre-harvest use, residual chlorine levels in the water in direct crop contact or as water from cleaning irrigation systems applied to soil must not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act, except that chlorine products may be used in edible sprout production according to EPA label directions.

(iv) for use in water for irrigation purposes.

• Uses in organic crop production: Used as cleaner for irrigation systems.



• **OTA Position:** Potassium hypochlorite currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.

Soap-based algicide/demossers | §205.601—for use as bait in insect traps only, no direct contact with crop or soil.

- Uses in organic crop production: Used to control algae and moss build-up on irrigation systems.
- **OTA Position:** Soap-based algicide/demossers currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, they are necessary for organic production, there are no viable alternatives, and they are consistent with organic crop production.

## Ammonium carbonate | §205.601—for use as bait in insect traps only, no direct contact with crop or soil.

- Uses in organic crop production: Used for bait in insect traps.
- **OTA Position:** Ammonium carbonate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.

#### Soaps, insecticidal | §205.601—As insecticides (including acaricides or mite control).

- Uses in organic crop production: Used for control of hard- and soft-bodied pest insects in the larval stage.
- **OTA Position:** Insecticidal soaps currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, they are necessary for organic production, there are no viable alternatives, and they are consistent with organic crop production.

### Sucrose octonoate esters | §205.601 (CAS #s—42922-74-7; 58064-47-4)—in accordance with approved labeling.

- Uses in organic crop production: Used to control soft-bodied pest organisms including mites, aphids, and whiteflies.
- **OTA Position:** Given the Board's recommendation to remove this listing in its last review, OTA is interested in hearing from members if there is a need for this substance, and whether the EPA-registered products containing this substance are in use by organic producers.



#### Vitamin D3 | §205.601—as rodenticides.

- Uses in organic crop production: Used for rodent control.
- **OTA Position:** Vitamin D3 currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.

Aquatic plant extracts | §205.601 (other than hydrolyzed) – Extraction process is limited to the use of potassium hydroxide or sodium hydroxide; solvent amount is limited to that amount necessary for extraction.

- Uses in organic crop production: Used as a fertilizer and soil amendment.
- **OTA Position:** Aquatic plant extracts currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, they are necessary for organic production, there are no viable alternatives, and they are consistent with organic crop production.

#### Lignin sulfonate | §205.601—chelating agent, dust suppressant.

- Uses in organic crop production: Used as a chelating agent and dust suppressant.
- **OTA Position:** Lignin sulfonate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.

# Fatty alcohols | §205.601 (C6, C8, C10, and/or C12)—for sucker control in organic tobacco production.

- Uses in organic crop production: used to kill or inhibit sucker growth in tobacco plants, which facilitates growth of harvestable leaves, reduces pest pressure, increases crop yields and contributes to farmworker safety in reducing exposure to potential health impacts of manual desuckering.
- **OTA Position:** Fatty alcohols currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, they are necessary for organic production, there are no viable alternatives, and they are consistent with organic crop production.

# Sodium silicate | §205.601—As floating agents in postharvest handling. Sodium silicate—for tree fruit and fiber processing.

• Uses in organic crop production: Used as a floating agent in postharvest handling of tree fruit and fiber.



• **OTA Position:** Sodium silicate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.

EPA List 4 Inerts | §205.601 As synthetic inert ingredients as classified by the Environmental Protection Agency (EPA), for use with nonsynthetic substances or synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances. (1) EPA List 4—Inerts of Minimal Concern.

- Uses in organic crop production: Used as inactive ingredients formulated with allowed pesticide active ingredients.
- OTA Position: OTA has commented extensively on this listing, which references a list no longer maintained by EPA. OTA recognizes the need to determine a solution that allows inert ingredients in pest control products that are vital to organic operations, meet OFPA criteria, and allow for the development of new products to meet the needs of organic operations. OTA generally supports the recommended rulemaking options voted on at the October 2024 NOSB meeting and looks forward to further work on this from the NOP.

Until there is an alternative to this listing, OTA supports the continued listing to ensure organic operations have the tools essential to their success.

### Paper | §205.601—production aids; paper-based crop planting aids

- Uses in organic crop production: Used as a crop production aid in pots, seed tape, and collars that are placed directly into the soil.
- **OTA Position:** Paper currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.

#### Arsenic | §205.602

- Uses in organic crop production: Prohibited for use in organic production. Used in the production of pesticide treated wood products, herbicides, and insecticides for applications in conventional production.
- **OTA Position:** OTA supports the continued prohibition of arsenic in organic production.



Strychnine | §205.602

- Uses in organic crop production: Prohibited for use in organic production. Strychnine is a toxic alkaloid allowed in conventional agriculture for below-ground use to control pocket gophers.
- **OTA Position:** OTA supports the continued prohibition of strychnine in organic production.

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,

Scott Rice Sr. Director, Regulatory Affairs **Organic Trade Association** 

cc: Tom Chapman Co-CEO Organic Trade Association



April 21, 2025

Ms. Michelle Arsenault National Organic Standards Board USDA-AMS-NOP

Docket: AMS-NOP-24-0081

#### Materials Subcommittee Discussion Document: Research Priorities RE:

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Materials Subcommittee on its discussion document related to research. 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. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA appreciates the Subcommittee's thoughtful effort to advance research priorities that balance the needs and priorities of several sectors. We appreciate the creation of the Research Priority Framework and the efforts to set priorities and offer the following recommendations for priority changes and addition of topics that are of high importance and not yet included on the current list.

We submit the following topics in support of the Subcommittee's continued work. Detailed comments on these topics follow.

- 1. Imports/Exports and Trade Disparities
- 2. Economics of Organic: Certification, Production, and Profitability
- 3. Economic Impact of Organic on Regional Economies
- 4. Market Data and Supply/Demand Transparency
- 5. Organic Yield Gaps and System-Level Productivity
- 6. Organic Traceability and Supply Chain Technology
- 7. Corn and Soy Trade Deficits
- 8. Organic Livestock: Expand Pork Priority to Include Beef



#### 1. Imports/Exports and Trade Disparities

Organic trade plays a pivotal role in meeting the demand for key organic commodities not currently produced in sufficient volume in the U.S. However, there is limited visibility into the size, scope, and composition of organic imports and exports due to incomplete statistical tracking and the lack of harmonized tariff codes. Comprehensive research is needed to create a clearer picture of the total market, including economic opportunity costs tied to imports of high-demand commodities such as soybeans, beef, and tropical fruits as well as export opportunities in value added products. Such research should include comparative trade flows between organic and conventional markets, an analysis of the trade deficit's economic and environmental implications, and assessments of how regulatory and logistical barriers limit U.S. organic exports. This information is essential to developing strategic policies and investments to improve market access and competitiveness. Specific areas of research could include:

- Comparative analysis of organic vs. conventional trade flows across key commodities
- Economic assessment of lost value from reliance on imported organic goods
- Development of improved trade tracking systems and HTS code alignment •
- Impact of phytosanitary and certification-related trade barriers on exports
- Opportunities for expanding organic exports in high-potential markets •
- Case studies on import reliance for soy, corn and beef •
- Infrastructure needs for scaling domestic export capacity •
- Role of reciprocal equivalency agreements and trade policy alignment

#### 2. Economics of Organic: Certification, Production, and Profitability

Despite continued growth in organic sales, there remains a gap in understanding the full economic picture of organic operations, especially for small and mid-size farms and middle supply chain actors like processors and distributors. Research is needed to quantify the costs associated with organic certification, compliance, and production, as well as to examine how premiums, market access, and value-added strategies contribute to profitability. Greater understanding of cost structures across different sectors and geographies can inform more effective technical assistance programs, risk management tools, and investment strategies. This research should also explore economic incentives and disincentives influencing the decision to adopt or maintain organic certification. Key research areas should include:

- Cost breakdowns of organic production by sector and region •
- Time and labor demands associated with certification and recordkeeping •
- Costs of certification and inspection and how they have changed over time
- Profitability comparisons between organic and conventional systems •
- Economic viability of mid-tier value chains and co-packing infrastructure
- Certification costs relative to operation size and revenue •
- Barriers to entry for new market participants •
- Return on investment from transition programs and technical assistance ٠
- Business model innovations (e.g. cooperatives, CSAs, vertically integrated brands) •



#### 3. Economic Impact of Organic on Regional Economies

Organic agriculture contributes to regional economies not just through farm revenue, but through job creation, downstream economic activity, and community development. Yet few studies have captured this impact with sufficient detail. Research should assess the contribution of organic production and supply chains to employment, income stability, farmer retention, land values, and tax revenue. Special attention should be paid to the differential impacts in organic "hotspots" versus "coldspots," building on previous USDA-funded research and providing insights into how regional strategies can foster growth. This type of analysis is critical for making the case for public investment in organic and for aligning with broader federal and state economic development objectives.

Key research areas should include:

- Impacts of organic production on employment, household income, livelihoods/wellbeing metrics, • farmer recruitment and retention
- Impacts of organic production and supply chains on the value and success of organic businesses and brands
- Assessments of the opportunities lost and gained by organic imports/exports at local to state levels
- Assessments of organic consumption and consumer perceptions of organic/non-organic, particularly in areas where the organic market is not currently thriving
- Comprehensive cost accounting of chemical farming externalities such as soil and water pollution cleanup, biodiversity loss/restoration, and the cost to address health issues related to chemical exposure
- Impacts of federal funding investments on organic transition, farmer retention, and income
- A refresh of the organic hotspots research (USDA ERS, 2015) and a contrasting look at coldspots to learn what is needed to transform them into growth regions

### 4. Market Data and Supply/Demand Transparency

Reliable market data is foundational for effective decision-making in any agricultural sector. For organic, current data availability is inconsistent and often delayed, making it difficult for producers and businesses to plan. The lack of data limits both private investment and policy development. A priority area of research is the design and implementation of a routine organic market reporting system, akin to USDA's WASDE, that provides acreage, yield, price, inventory, and consumption data. Additional research is needed on the feasibility of expanding organic data collection in NASS surveys and AMS market reports, as well as on how data transparency affects market performance and resilience. Recommended research efforts include:

- Feasibility study for an organic WASDE-style report •
- Organic price discovery and basis reporting for key commodities •
- Farmer planting intentions and marketing channel preference surveys
- Analysis of supply volatility and seasonal price impacts
- Identification of data gaps in existing USDA organic datasets •



- Expansion of certified handler and processor reporting metrics
- Creation of region-specific organic supply-demand baselines
- Case studies on price transmission across organic supply chains

### 5. Organic Yield Gaps and System-Level Productivity

Yield drag is frequently cited as a challenge for organic systems, yet there is limited research on the systemic factors that drive yield differences across crops, geographies, and practices. This research should go beyond simple yield comparisons and instead investigate the complex ecological and management factors that influence productivity in organic systems. These include soil health, nutrient cycling, varietal selection, weed and pest pressure, and climatic resilience. Furthermore, the research should assess yield stability under environmental stressors and evaluate how yield can be optimized without compromising organic principles.

Target research topics should include:

- Root cause analysis of yield drag in organic production
- Systems-based strategies to close the yield gap (e.g., rotations, intercropping) •
- Development and performance trials of organic-optimized crop varieties
- Yield stability under drought, extreme temperatures, or pest outbreaks •
- Relationship between soil health indicators and productivity in organic systems ٠
- Use of cover crops and green manures to improve nutrient availability •
- Synergies between yield and disease/pest resistance in biologically intensive systems
- Trade-offs between yield and other sustainability metrics (biodiversity, water, soil health, etc.) •

### 6. Organic Traceability and Supply Chain Technology

The organic sector's traceability infrastructure, including the USDA Organic Integrity Database and certification recordkeeping systems, represents a unique and underutilized resource for innovation. As global regulatory frameworks such as the EU Deforestation Regulation (EUDR) begin to impact trade, organic systems may offer a competitive advantage if appropriately leveraged. Research should examine the economic and compliance benefits of enhanced traceability systems, as well as the integration of blockchain, digital ledger technologies, and other traceability tools. Additional research is needed to explore the cost, technical feasibility, and security considerations of digitizing certification and audit processes.

Research areas could include:

- Comparative analysis of the Organic Integrity Database vs. other traceability systems •
- Blockchain or other emerging technologies for automated audits and mass balance •
- Integration of USDA organic records with customs/import databases •
- Role of digital traceability in compliance with the EU Deforestation Regulation (EUDR)
- Case studies of traceability-driven fraud prevention •
- Economic and technical feasibility of digitizing organic certificates •
- Stakeholder trust and data security concerns in traceable supply chains •
- Traceability cost-sharing models for small and mid-sized operations •



#### 7. Corn and Soy Trade Deficits

The United States is a leading exporter of conventional corn and soybeans but remains heavily reliant on imports for these same crops in organic form. This trade imbalance undermines domestic feed security, weakens supply chain transparency, and exposes the market to import-related fraud risks. Research is needed to understand the market, agronomic, and policy factors that have contributed to this disparity and to identify viable solutions.

Research areas include:

- Regional assessments of agronomic suitability for organic corn and soy
- Cost competitiveness comparisons between U.S. and major exporting countries
- Infrastructure analysis (e.g., grain elevators, segregated storage, processing)
- Impact of crop insurance and commodity programs on organic acreage decisions
- Demand projections by feed sector (e.g., dairy, poultry, livestock)
- Risk assessment of imported organic feed fraud incidents
- Transportation and logistics bottlenecks in organic grain marketing
- Investment and subsidy options to increase domestic production

#### 8. Organic Livestock: Expand Pork Priority to Include Beef

Organic beef is now the largest single category of organic imports by value, primarily sourced from Australia and Uruguay. Despite strong consumer demand, domestic organic beef production has lagged due to a range of constraints. Research is needed to understand the barriers to domestic organic beef expansion, including breed availability, feed systems, processing capacity, animal welfare standards, and competition from non-organic claims like grass-fed or pasture-raised. Economic modeling should be conducted to explore the feasibility and profitability of transitioning conventional beef systems to organic.

Suggested areas of research include:

- Market share and pricing comparison of organic vs. other claims-based beef
- Regional variation in processing access and inspection barriers
- Analysis of feed sourcing challenges for certified beef herds
- Lifecycle cost-benefit analysis of converting to organic beef systems
- Consumer demand and label perception studies
- Housing, pasture, and health management standards and their feasibility
- Breed selection and adaptation for pasture-based beef production
- Workforce and labor availability in certified organic beef supply chains

**Recommendation on Structure:** Several of these priorities intersect across crops, livestock, and handling. For example, trade-related research (imports/exports, soy/corn deficits) cuts across all sectors. We recommend the Subcommittee consider creating a fourth "Cross-Cutting" category in the Research Priorities Framework to accommodate multi-sectoral topics that are currently difficult to classify but are of critical importance.



On behalf of our members, OTA thanks the NOSB and the Materials Subcommittee for your leadership on this issue. We are committed to supporting the development of a robust research priorities to help advance the organic sector.

Respectfully submitted,

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Scott Rice Sr. Director, Regulatory Affairs Organic Trade Association

cc: Tom Chapman Co-CEO Organic Trade Association



April 21, 2025

Ms. Michelle Arsenault National Organic Standards Board USDA-AMS-NOP

Docket: AMS-NOP-24-0081

### RE: Certification, Accreditation, and Compliance Subcommittee Proposal: Risk-based Certification

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Certification, Accreditation, and Compliance Subcommittee on its proposal related to risk-based certification. 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. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA appreciates the Subcommittee's thoughtful effort to advance a risk-based approach that balances organic integrity with certification system efficiency. We support the proposal's goals to develop shared definitions, consistent risk criteria, an oversight matrix, and aligned training for certifiers and inspectors. These steps can support the long-term sustainability of the organic certification system while maintaining a strong deterrent to fraud.

We submit the following comments in support of the Subcommittee's continued work on this topic:

#### The Need for Shared Definitions and Criteria

As we noted in our Fall 2024 comments, shared terminology is essential for consistent interpretation and execution of risk-based oversight. OTA agrees that shared definitions are essential and supports the Subcommittee's proposal to align terminology used across resources, including updates to the NOP Organic Integrity Learning Center (OILC) course NOP-230: *Risk-based Oversight*. However, we strongly recommend that any revisions to NOP-230 clarify and distinguish the different levels at which risk-based oversight is applied. Currently, the course intermixes these levels—USDA program-level oversight, certifier accreditation, entity-level certification, and day-to-day operational risk management—without clearly delineating how risk manifests and is managed at each.



The proposed definition of "risk-based oversight" is most appropriate for application at the certification and operational levels (e.g., a certifier's evaluation of an operation or an operation's internal compliance plan), but is less appropriate for USDA's programmatic oversight or for the accreditation of certifiers. If NOP-230 is to be updated, we recommend it be refined and focused to reflect its intended audienceideally separated or modularized for clarity. For example, this may be less applicable to lesson 2 which focuses on the internal operations of a certification agency.

Additionally, we believe the proposal omits a higher-level conversation about risk at the programmatic level. The current definitions focus on non-compliance, but not all non-compliances pose the same threat. For example, inadequate labeling oversight at a 100% organic operation poses far less risk to the integrity of the organic label than similar oversight failures at a split operation where commingling is far more likely to occur. Programmatic risk-based oversight must go beyond risk of non-compliance and instead focus on evaluating how and where they pose risk to organic integrity—whether through intentional fraud or through unintentional errors stemming from structural or procedural vulnerabilities.

We are concerned that the current proposed definition of "risk" is overly focused on intentional fraud. A risk-based approach must also account for broader threats to organic integrity, including those that arise unintentionally through poor training, structural weaknesses, inadequate oversight, or simple human error. A robust definition of risk must encompass both the likelihood and potential impact of any actionintentional or not—that could compromise organic integrity.

Certifiers need flexibility in how they apply oversight tools, but they should be operating from a shared foundation of risk criteria and performance indicators to ensure consistent performance. It is unclear if these revised definitions will achieve this objective.

### **Broader Stakeholder Engagement Is Essential**

While the proposal rightly identifies ACA and NOP as key partners, OTA urges the NOSB and NOP to include a broader set of stakeholders-including trade organizations-in the development of risk criteria, oversight matrices, and training resources. Certification oversight must reflect the realities of trade dynamics, global supply chains, and market-based vulnerabilities. Trade stakeholders offer critical insights into high-risk commodities, supply patterns, and competitive pressures that may not be visible to certifiers or regulators alone.

Without the voices of organic businesses and producers, there is a risk that the system will lean too heavily on accreditation-centered perspectives, which may overlook operational realities or inadvertently impose inefficiencies. A narrow focus on certifiers and regulators guarantees that risk prioritization is always reactive, vs. a proactive stance that focuses resources on emerging areas of risk before they cause reputational damage to businesses, producers, or the organic label. OTA is eager to collaborate with NOP, ACA, and the NOSB to ensure the framework is informed by all facets of the



organic community. We encourage engagement with organizations beyond OTA to bring in a well rounded focus on various sectors, levels, and sizes of trade.

OTA supports the proposal for NOP to communicate acute risks to certifiers on a predictable, annual basis—such communication will help certifiers better plan and align oversight activities with risk prioritization. However, we believe this communication must not be a one-way process. To be effective, it should be paired with a formal mechanism for industry stakeholders—including brands, importers, traders, customs brokers, and retailers—to confidentially share intelligence on emerging risks. Many actors in the organic trade community possess critical, real-time information about supply chain disruptions, suspicious trade flows, or problematic actors that may not rise to the level of a formal complaint but nonetheless warrant NOP or certifier attention. Creating a structured pathway for this type of non-complaint-related information to inform NOP's annual risk communications will strengthen the credibility and responsiveness of the risk-based certification system as a whole.

#### **Reducing Burden on Low-Risk Operations**

The current certification system imposes disproportionate costs on both very small and very large operations, despite vastly different risk profiles. A well-calibrated risk-based approach can reduce redundant paperwork and unnecessary verification steps for compliant, low-risk operations. This would not only lower the cost for these operations but also allows for the redirection of those resources to highrisk operations and better services levels. OTA supports consideration of streamlined inspections, reduced paperwork, and tiered oversight activities for such operations, as long as integrity of the organic seal is preserved.

We continue to encourage the NOP to evaluate whether standardized or simplified Organic System Plans (OSPs) for low-risk categories could improve efficiency without sacrificing integrity. Such improvements could help reduce attrition among certified farms and processors, lower barriers to entry for new organic businesses, and improve applicability of technical resources for all operations.

In summary, OTA offers the following recommendations:

- Ensure NOP-230 is appropriately revised to focus on risk-based oversight of certified entities and ٠ their operations. Obfuscation with broad risk-based oversight should be removed. Risk-based oversight needs to continue to be pursued at a programmatic level and it should focus on scale and likelihood of risk to organic integrity vs. non-compliances.
- Engage a broader range of stakeholders beyond ACA and certifiers in the development of risk • criteria and oversight processes. Collaboration with OTA, the Organic Farmers Association, and other sector representatives will strengthen the framework.



- Establish a formal process for industry to submit data on emerging risks-including noncomplaint-related intelligence from trade actors, customs brokers, or downstream buyers.
- Risk based certification should result in prioritized use of resources that result in less resources • going to low-risk areas and more resources going to high-risk areas. If focus is purely on high risk then resource constraints will prevent measured improvements.

On behalf of our members, OTA thanks the NOSB and the CACS for your leadership on this issue. We are committed to supporting the development of a robust, risk-based certification framework that protects the integrity of the USDA Organic seal while improving system efficiency and reducing burdens where possible.

Respectfully submitted,

Scott Rice Sr. Director, Regulatory Affairs **Organic Trade Association** 

cc: Tom Chapman Co-CEO **Organic Trade Association** 



April 15, 2025

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

#### **RE: Materials Subcommittee - Research Priorities Spring 2025 (Discussion Document)**

Dear Ms. Arsenault:

Thank you very much for this opportunity to provide comments on the Materials Subcommittee proposal on the Spring 2025 Research Priorities.

The Organic Center is a non-profit organization with the mission of convening credible, evidencebased science on the environmental and health benefits of organic food and farming and communicating findings to the public. We are a leading voice in the area of scientific research on 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. We work closely with other non-profit organizations and stakeholders across the value chain to inform our understanding of research needs to support the organic sector and movement as a whole.

In the past year we have increased our engagement with farmers and researchers in the Southeastern part of the U.S. to expand our understanding of knowledge gaps and to identify pathways to increase research and extension in this region. In late 2023, alongside Tuskegee University, Clifbar, and the Foundation for Food and Agriculture (FFAR), we co-hosted a virtual listening session that informed an in-person multi-stakeholder event we co-hosted in November 2024 in Montgomery, Alabama. These events have increased our understanding of a region we've had less engagement with in the past and therefore our recommendations better reflect the comprehensive research needs for the whole U.S.

We have also increased our global collaborations, particularly through increased engagement with IFOAM Organics International and its regional bodies of the European Union and Asia, which gives us a better understanding of international research resources that can help fill U.S. research gaps, and knowledge gaps that still exist globally (e.g. how organic can improve dryland farming), and the market/business landscape of organic at a global level that can inform U.S. research needs.

The Organic Center thanks the Materials Subcommittee for its recommendations on Research Priorities. We appreciate the creation of the Research Priority Framework and the efforts to set priorities, and offer the following recommendations for priority changes and addition of topics that are of high importance and not yet included on the current list.



#### Summary:

- ✓ The Organic Center generally supports the subcommittee's proposed Spring 2025 Research Priorities. The proposed priorities are in line with the needs of the organic community, and will serve as an important resource to guide The Organic Center's research priority focus and project development.
- ✓ Based on feedback we have received during our stakeholder engagement efforts, we suggest that some ongoing crop research topics be elevated to top research priorities like whole farm assessments, nutrition comparisons, weed management and expanding nursery stock. We also recommend adding topics that we have identified as missing to the research priority list, particularly in the areas of measuring whole and true costs/benefits of food systems (e.g. True Cost Accounting, Life Cycle Assessments, health outcomes), water quality, socioeconomic impacts of organic, and measurements of the effectiveness of research outreach.
- ✓ While not a research *topic*, we suggest that USDA administration processes for funding applications be flagged as an important consideration that impacts the experience of the grantee and ultimately the quality of proposed research.

#### We offer the following more detailed comments:

#### **RESEARCH PRIORITY ADJUSTMENTS**

We have reviewed the list of topics included for Spring 2025 Priorities, and we were particularly pleased to see the inclusion of the following topics and recommend an increase in their priority:

- 1. Whole farm ecosystem service assessments to determine the economic, social, and environmental impact of farming systems choices,
- 2. Factors impacting organic crop nutrition, and organic/conventional nutrition comparisons,
- 3. Strategies for the prevention, management, and control of problem insects, diseases, and weeds in light of a changing climate, and how to anticipate or predict new pest problems. Systems-based approaches are emphasized.

We encourage the subcommittee to elevate the priority of these topics, placing the highest priority on whole farm assessments, which will arguably require the greatest injection of resources to execute. There is a general deficiency in research results for all of the above topics and these results are of great need and interest to farmers, consumers and businesses, (especially those making investment decisions influenced by Environmental Sustainability Goals and Science Based Targets), and policy makers—particularly when health outcomes, socioeconomic outcomes, and external costs are included in these assessments.



1. Whole farm ecosystem service assessments to determine the economic, social, and environmental impact of farming systems choices:

Comprehensive studies that measure holistic functions of organic practices are largely lacking, but offer critical insights that can 1) Help farmers know to either maintain course or adjust their methods and give guidance on best practice adjustments, and 2) Provide critical evidence to demonstrate the true value of organic farming to stakeholders across the supply chain, influencing market demand, business investments, and political support. Because of the extreme need and potential influence on the ability to grow the organic industry and movement, we recommend that this research priority be increased within the top priority list.

**Topic Additions:** We also recommend that either this topic OR the topic "*Ecosystem service provisioning and biodiversity of organic systems*" be refined to emphasize a need to measure true costs (e.g. TCA, LCA, health outcomes), both positive and negative, of all assessments on organic farms and also include conventional counterparts for comparison. Currently there are much more published data available for practice outcomes on non-organic farms, so collation of existing data for reviews or meta-analyses will be possible and a smaller lift than collecting the much-needed primary data from organic systems, particularly those that are more diversified across space and time. However, direct comparisons in the field in the same space and time will be more powerful.

We call out the organic to non-organic comparison because the OREI program does not encourage these kinds of studies for its funding priorities at the moment. We advocate for their inclusion in the OREI program *or* adding this as a priority in other NIFA programs if this pathway is more feasible .

The topics of **true cost accounting (TCA)** and **life cycle assessments (LCA)** may be some of the most pressing research needs at the moment as consumers, businesses and policymakers are asking for more outcomes-based evidence to justify their spending/support for organic. Collecting more primary data to feed into models that the market is using to value businesses and organic production, is essential. Currently a dearth of appropriate data exists for such models, and the models themselves need to be adjusted to better fit the complexity of the organic production system both in space and time. Current models also do not consider whole-system externalities of the use of agrochemicals (including their manufacturing) or the benefits of not using these chemicals in organic. Consequently, *results are often skewed in favor of conventional farms* which reiterates misconceptions about organic such as the need to convert more virgin land to farming if we want to feed the world with organic.

Our engagement with businesses using these existing models as well as LCA and TCA practitioners and researchers over the past three years indicates that this is a critical situation that will continue to hinder the ability of the organic market to grow fueling our recommendation to move this to the top of the priority list. Specifically, we've learned that because the shortcomings of models used as a standard measurement of sustainability are failing to show the benefits of organic there have been a devaluation of organic companies, decisions to switch from sourcing organic to conventional ingredients, and the perpetuation of misguided information delivered to consumers.



#### 2. Factors impacting organic crop nutrition, and organic/conventional nutrition comparisons.

This topic is growing in popularity amongst consumers who want to better understand the benefits of organic food to themselves and their families. While the interest in potential dietary exposure to pesticide contamination is of concern, the most recent OTA Consumer Survey shows that consumers are most willing to pay for products that they believe to be healthy and nutritious. Published research predominately shows that organic crops have more micronutrients and antioxidants, and that organic animal products like dairy and meat contain healthier fatty acid profiles, antioxidants, and increases in some vitamins and minerals, but much more research in this area is needed to make conclusions robust and comprehensive of a wide range of crops/ingredients. Given the high consumer interest in this topic and therefore the potential for this research topic to improve the market for organic products, we recommend that this research topic be elevated to a top priority.

# 3. Strategies for the prevention, management, and control of problem insects, **diseases**, and **weeds** in light of a changing climate, and how to anticipate or predict new pest problems. Systems-based approaches are **emphasized**

First, we recommend that the system-based component of this topic be prioritized, not just emphasized. Given surveys conducted by National Young Farmers Coalition, Organic Farming Research Foundation, and our own work in the Southeastern US with organic researchers, extension and farmers/farmer group representatives, we recommend that the there be an additional prioritization of this research and extension to be conducted in the Southeastern U.S., where weeds and fungal diseases continue to rise to the top of challenge lists for farmers. We've heard specific requests for organic compliant and effective pre-emergence herbicides and more research on the innovation of more effective weeding equipment and/or more outreach and technical assistance to address weed management. Given the changes in weather patterns, particularly the increase in temperature and rainfall/humidity in this region, we expect the urgency for this kind of research to increase.

#### ADDITIONAL RESEARCH NEEDS

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 regularly with researchers from academic institutions across the U.S., and hold one-on-one meetings with individual companies, farmers, professors, and consumers. In December 2023, we also co-hosted a virtual convening with FFAR, Clif Bar, and Tuskegee to assess organic research and extension needs in the Southeastern U.S. and followed this with an in-person convening in November 2024. Based on all of this engagement, we feel that the NOSB Materials Subcommittee's proposed Spring 2025 Research Priorities are largely in line with the needs of the organic industry, and appreciate the release of this report as an important resource to guide research priorities and project development.



Based on feedback we've received during our outreach efforts, we suggest the following research topic areas be added to the currently proposed list (ranked by priority and details follow):

- 1. \*\*Assessment of health benefits/outcomes of organic in terms of nutrition and in terms of avoiding chemical residues or spray drift in rural areas
- 2. \*\*State-by-State socioeconomic impacts of organic farming
- 3. Assessments of organic and conventional impacts on water quality
- 4. Best practices to improve organic farming in dryland areas
- 5. All crop research questions should include encourage a focus on minor crops and varieties
- 6. Measuring and improving the effectiveness of research extension programs
- 7. Include plastic used in across the supply chain, not just in production
- 8. Time to maturity for organic crops
- \*\* Should be added as a Top Priority

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<u>1. Assessment of health benefits/outcomes of organic in terms of nutrition and in terms of avoiding chemical residues or spray drift in rural areas.</u>

A far-reaching demand to connect human health to diet and environment does not meet the amount of scientific research that's needed to make confident claims in those connections. For instance, while we know that organic products tend to have more antioxidants and dramatically fewer chemical contaminants and that consuming organic products does reduce dietary exposure to hazardous chemicals, we do not have enough scientific evidence to make claims about health outcomes from the consumption of organic products. There is a growing body of evidence that connects pesticide use and synthetic chemical consumption (e.g. food dyes) with negative health outcomes, but this topic could also use more research. And more comparisons of health outcomes for rural communities near primarily organic or primarily industrial chemical agriculture would be extremely informative.

Data from this kind of research would very likely drive an increase in demand for and consumption of organic products and provide strong enough evidence to support policy changes that would increase support for organic production and market development, including public procurement.

While USDA doesn't typically fund medical research, we believe that assessments of pesticide use and their correlations with health outcomes and economic consequences could fit into NIFA priorities, and we flag this topic here in case there is opportunity for NOSB to recommend this type of research to other government funding agencies (e.g National Institute of Health).



#### 2. State-by-State socio-economic impacts of organic farming

Understanding the economic impact of organic farming is especially important because it can influence advocacy and policymaking, and funding support for organic research, transition and market development. And yet, this kind of research and data are extremely limited, particularly at a state-by-state level.

Specific state-by-state research that would help improve advocacy efforts include:

- Impacts of organic production on employment opportunities/rates/stability, household income, livelihoods/wellbeing metrics, farmer recruitment and retention.
- Impacts of organic production and supply chains on the value and success of organic businesses and brands.
- Assessments of the opportunities lost and gained by organic imports/exports at local to state levels
- Assessments of organic consumption and consumer perceptions of organic/non-organic, particularly in areas where the organic market is not currently thriving.
- Comprehensive costs accounting of chemical farming externalities such as soil and water pollution cleanup, biodiversity loss/restoration, and the cost to address health issues related to chemical exposure in diets and the environment
- Impacts of federal funding investments on organic transition, farmer retention, sales/income.
- A refresh of the organic hotspots research that was based on census data from 2015 and a contrasting look at organic coldspots to see how regions with a wealth or dearth of organic impact various socioeconomic metrics, and learn what is needed to transform coldspots to hotspots.

#### 3. Assessments of organic and conventional impacts on water quality/contamination

While we appreciate that the current list of research priorities includes the examination of contaminated inputs like water and manure on organic systems, and the potential of contamination of soil and water by 'forever chemicals', we still see a need to include a broader assessment of how organic versus conventional farming influences the quality/contamination of water sources (e.g. nearby riparian areas, catchment systems, ground water, etc.).

Better understanding how water resources, particularly <u>drinking water</u>, are impacted by farming practices, are important for the development of best practices on all farms, but this information can also provide a critical lever for public and political support of farming practices that improve the quality of our water resources. Understanding this is not only a matter of public health, but also another powerful tool that can motivate consumers to buy organic. However, potential impacts of organic should also be measured to provide a comparison and to not simply assume that organic is free from any negative impact.



#### 4. Best practices to improve organic farming in dryland areas

IFOAM Organics Asia has recently developed the Dryland Organic Agriculture Network (DOAN) and has hosted international convenings in China and Portugal. They bring together local and international farmers, researchers and policymakers to exchange knowledge of and experiences with improving the success of dryland farming through organic practices. While there is already a large proportional of dryland areas across the globe, this amount is expected to increase with longer and harder droughts, and desertification by soil degradation. The U.S. is not immune to this expansion, and while many drylands are currently successfully farmed because of access to freshwater sources like groundwater, rivers and aquifers, this is not sustainable and most sources are already overdrawn posing a massive threat in the near future. Learning how to build soil and farm with less water is critical, and successful dryland farming could be expanded with sufficient research and extension, and networking with others around the world whose innovations have led to great success.

### 5. All crop research questions should encourage a focus on minor crops and varieties that have high cultural importance for a broader range of farmers.

Our recent work throughout the Southeastern US revealed a strong desire by many small to medium sized farmers who prefer to grow minority crops or heirloom varieties of major crops that are more suitable to their community's culture and taste preferences. But much of the current research and extension efforts aiming to improve production do not focus on the same types/varieties of crops they would prefer to grow, and could use technical assistance and research outcomes to improve their production. Farmer and consumer interviews/surveys that aim to identify preferred crops and unique research topics and resource needs should be administered to develop a more comprehensive list of crops that need additional research.

#### 6. Measuring and improving the effectiveness of research extension programs

Land grant institutions receive federal funding to support extension programs and specialists/agents, and current NIFA funding programs require integration of research extension into funded projects. And yet, we continue to hear from farmers that there is a disconnect between research and their access to results. This communication breakdown can occur when various audiences are not given information, or when the information delivered is not communicated in effective ways (e.g. language, cultural barriers). Since this topic was raised with us two years ago by farmers, we've continued to hear the same challenges throughout our stakeholder engagement, particularly from communities (or representatives) where English is not the primary language and where existing extension and outreach programs have systemically favored some groups of farmers over others.

To better serve all current organic, transitioning, and organic curious farmers, we recommend that comprehensive assessments on the effectiveness of current extension and outreach effort be undertaken in any community with existing and proposed research. Where are efforts successful and why, and where are efforts failing and why? For instance, the quantity of extension/outreach professionals and contact hours is not enough to ensure effective knowledge exchange and support for farmers and businesses—how information is exchanged is also vital. It matters who is delivering



information, what information is being gathered to inform better research and outreach, what the trust is between the outreach provider and the community, the language that's used, the format of the information that's delivered, and the strength of knowledge networks. Local and regional explorations could be conducted just about anywhere in the US, but a target on those areas where we know organic production lags behind would be a good place to start.

We also need research results to be made more widely available to the public (i.e. more extension materials to bring science out from behind pay- and literacy-walls published in a well known, accessible and centralized repository) and offered in various languages from lay-person English to regionally specific English and other non-English languages determined by the communities being served.

#### 7. Include plastic used across the supply chain, not just in production

We appreciate that "The extent and impact of plastic use in organic crop production, and how organic producers can lead in reducing it and aligning with consumer concerns" is a top priority (though we would place this lower on the list than whole farm system research). We recommend expanding the priority to include plastic used in other links in the supply chain from the field to the shelf.

For instance, beyond the well-known use of plastic in packaging, our continued work including a 2-Day conference dedicated to the topic of reducing plastic across the entire organic supply chain, an industry survey, a virtual town-hall-style listening session, and workshop session at Organicology 2025, has taught us that a lot of plastic is also used in the movement of products from to and from handlers and retailers, and there are many substitutions, recycling options, and network development opportunities that could help various actors along the supply chain find plastic alternatives or increase recycling to reduce overall plastic use. But there is a dearth of research and collation of information including critical outreach and education materials that need to be developed to help the organic sector make any major shifts.

#### 8. Time to maturity for organic crops

Crop insurance provisions require crops to be planted between the earliest and latest planting dates to be eligible for a loss payment. 7 C.F.R. § 457.8. Coverage also ends at the end of the crop year, which is the "period within which the insured crop is normally grown." If an organic crop has different planting and harvesting timelines, it could result in a loss in coverage. It may be necessary to adjust planting dates for varieties of crops grown under organic production if the genetics or ambient conditions impact the time to maturity for organic crops compared to conventional. The data needed to assess the necessity of these adjustments is lacking, but implications could be major if organic crops do indeed have different maturity rates that do not align with current crop insurance provisions.

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#### Considerations of funding program administration: the application process

The following are comments offered to the Materials Subcommittee in 2024. While we understand these may have been taken into consideration already, without written indication of this consideration in the 2025 materials list for review, we offer them again for reference. Several USDA NIFA funding programs like OREI, ORG, AFRI, SCRI, etc. play a pivotal role in advancing organic agriculture research and extension. These funding programs help ensure that organic systems remain productive and profitable while also providing a myriad of planetary benefits. The OREI and ORG funding programs are the primary drivers of organic systems research that lead to the development of new tools and practices that help organic farmers be more competitive in a changing global market.

While these invaluable sources of funding have the potential to dramatically improve organic production, the administration of the grant programs, including application solicitation and submission, must also be considered in their influence on the long-term success of organic research, extension, and production.

The Organic Center and the Organic Farming Research Foundation (OFRF) have years of high engagement with organic researchers and their own participation as project leads/collaborators, and together our organizations have collectively identified some opportunities and challenges with the administration process of two vital programs, OREI and ORG.

Beginning with what has helped make the application process more equitable and successful, we would like to acknowledge that publishing multi-year RFAs (requests for applications) with deadlines for more than one year in advance is <u>very helpful</u>. This gives all interested applicants a hard deadline to work with and under-resourced institutions more time to develop necessary collaborations, research questions and methods, and ensure their institutions have the capacity to submit proposals on their behalf. In the past, OREI has set deadlines in the summer, which aligns better with teaching schedules and avoids delays/challenges associated with winter holiday closures.

To ensure that applicants are set up for success in an inclusive and fair way to increase the submission of high-quality grant proposals with high-impact potential, we suggest three things:

1. There should be predictability in the timing of the RFA release and the deadlines should better accommodate academic calendars. Over the past several years the time of releasing the RFA for these two programs has been unpredictable. For OREI, it has ranged from October to March since 2014. When considering the academic calendar and the capacity constraints placed on research professors who teach (and those from less-resourced institutions tend to have high teaching loads), this inconsistency negatively impacts application rates and creates a significant barrier to less-resourced institutions. With more consistency in the timing of RFA release, we expect that applicants will be able to better fit the whole application planning and execution process into their workflow for the year. Publishing multi-year RFAs with deadlines in non-teaching months, particularly towards



the end of summer so that fieldwork is already underway, will relieve the pressure that occurs when deadlines are placed in winter or spring.

- 2. Consistency in available time for application with more time between release of RFA and application deadline. Similar to the release date of the OREI and ORG RFAs, a more-consistent timeframe to draft a grant application is prudent. Since 2014, the number of days to apply ranged from 37 to 91, which reflects 5 to 13 working weeks. Many universities require an internal review process that can take up to 10 business days. Therefore, considering the administrative processes and requirements many institutions have to meet for grants of the scale of OREI, the actual time between RFA release and the deadline may severely limit potential applicants. This is especially true for applicants who have heavy teaching loads, limited administrative support, and are at institutions that have limited resources all around.
- 3. **Coordination of deadlines across NIFA programs is needed.** Some organizations and institutions submit multiple applications to various NIFA funding programs within a given year. For example, in 2024, The Organic Center lead or collaborated on seven grant proposals across three NIFA programs with deadlines of Feb 6, Feb 15, and March 7. The administrative burden alone to meet this cluster of deadlines put an enormous and unnecessary strain on our capacity.

We also had an experience where one of our collaborating academic institutions, an underresourced Hispanic Serving Institution, could not accommodate the tight turnover between program deadlines and asked us to be the lead and submit on their behalf or else they would have to pull their OREI application this year. We were not well positioned to absorb the extra work, but committed to the submission to ensure that a worthy application was not abandoned. We heard other testimonies of academic faculty and administrative support limitations due to the stacked deadlines, which was exacerbated by the timing of winter holiday closures, teaching loads, and the need to build collaborations and request letters of support at a time of year when many people were out of office and/or stretched very thin.

And finally, The Organic Center's science staff provides review services for NIFA and other government funding programs. For two years in a row, we have had to back out of reviewing for the NIFA SCRI program because their review coincided with the due date for OREI. This limits organic representation on non-organic sources of funding.

These suggested changes will not only increase the feasibility of the application process for all researchers, but they will also increase support for organic agriculture research at institutions that have historically been underfunded and unrecognized in programs like these.

To that end, in addition to the need for increased organic research funding and refinement of the grant application program administration, we acknowledge that more infrastructure development to support applications and administration of grants across all institutions is needed, but primarily at minority-serving institutions and under-resourced institutions/organizations.



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.

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 ask the research community.

Respectfully submitted,

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