



May 4, 2026

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

Docket: AMS-NOP-25-0914

RE: Consistency in Organic Seed Use

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the National Organic Standards Board on consistency in organic seed use. 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.

At OTA, our strength comes from the knowledge, passion, and leadership of our members. Through OTA's Member Councils and Task Forces, experts from every corner of the organic sector come together to solve shared challenges, advance best practices, and amplify the voice of organic in policy, research, and the marketplace. One such member group is the OTA Seed Task Force, a cross-sector group of breeders, seed producers, certifiers, growers, and advocates working to strengthen the use of organic seed and planting stock across U.S. organic production. With organic seed requirements long established but unevenly implemented, the Task Force is developing collaborative, data-driven roadmaps to move the industry toward maximum use of organic seed and planting stock in a sensible and predictable way.

The Seed Task Force has been pleased to see the NOSB's renewed work in this area, including discussion documents put forth in Fall 2024 and 2025. We were discouraged that a discussion document did not accompany the Spring 2026 meeting, but are looking forward to hearing the perspectives shared during the upcoming seed panel. The Task Force recognizes the complex challenges of increasing organic seed production and use. This issue is especially challenging given the diversity of food, feed, and fiber grown by organic operations, and the varied availability of organic seed due to regionality, product end-use, regulatory exceptions, and lack of strong market signals to organic seed producers. This complexity makes tackling the organic seed issue difficult. While it may be tempting to avoid addressing the foundational flaws in the current system, and instead propose perfunctory adjustments, we urge the NOSB to work with us, and the majority of stakeholders, who have been very clear in feedback to the board: incremental fixes are no longer



sufficient. The limited commercial availability of organic seed is driven by both technical and economic challenges. Supply cannot develop without reliable demand, and reliable demand will not develop unless the market operates under common expectations and conditions. Organic seed is more costly to produce and often more expensive to purchase, which further limits demand. Without additional intervention, the commercial availability clause alone will not disrupt this negative feedback loop. Progress will require addressing the economic conditions that prevent organic seed markets from functioning at scale, while also working through the technical barriers that shape production, sourcing, and compliance.

In order to support the work of the CACS committee on this topic, the Task Force has performed in-depth research and analysis to clarify the underlying issues and has begun proposing practical solutions. Please see our extensive comments from the Fall 2025 meeting, which include vegetable and field crop case studies, as well as an analysis of publicly available data. Initial results from a certifier survey (still underway) were presented to the CACS committee in March 2026. We continue to emphasize that a successful regulatory approach must be informed by accurate seed demand and crop acreage data, which are severely lacking. Data on current use would support additional regulatory language to complement the 2018 recommendation and clarify what “full compliance” means in practice. In March we also suggested other areas for exploration including: approaching seed usage requirements based on specific crops, regions, and operation types; investigating the development of a seed availability resource through a public-private partnership; using a risk-based seed use requirement for handlers; and the development of crop expert groups to determine feasibility of organic seed usage. We are still waiting for a signal from NOSB that they have truly heard stakeholder feedback and are willing to get to work on any of these topics.

Beyond the work of the Task Force, we want to emphasize that the broader community has been actively engaged in providing input on questions posed by the board as wide-ranging as organic seed availability by crop, inspector enforcement, the role of handlers in dictating the seed used by growers, and organic seed production challenges (among others). Over the course of the last three NOSB meetings, including two which had discussion documents on consistency in organic seed use (Fall 2024 and Fall 2025), the board has received over 100 written and oral comments from organic farmers, seed companies, advocacy groups, certifiers, handlers/processors, and trade associations. Taken together, three consistent messages emerge regarding organic seed use.

First, there is **broad alignment that organic seed is foundational to organic integrity and requires stronger policy follow through**. Commenters across all three meetings emphasized that the existing commercial availability requirement has not driven sufficient change and called for USDA to act on longstanding NOSB recommendations, particularly the 2018 recommendation to require continuous improvement in organic seed use. Many stakeholders supported clearer expectations, better documentation, and training for certifiers to ensure that organic seed use is treated as a core compliance issue rather than an aspirational goal.



Second, **any approach to increased reliance on organic seed must be based on realistic timelines and continued flexibility for grower choice.** Enforceable milestones are needed to stimulate investment and innovation in organic breeding and seed development, but rigid mandates and/or premature enforcement could restrict farmer choice or undermine crop viability. Farmers specifically request regionally sensitive implementation and improved seed databases before tightening requirements.

Third, **stakeholders agree on the need for USDA action beyond additional discussion documents.** Many commenters expressed frustration that repeated NOSB discussions (revisiting the issue from Fall 2024 through Fall 2025) have not yet resulted in regulatory or guidance updates. There is consensus that clearer NOP guidance, certifier consistency, and better market signals are necessary. Likely, progress will depend on both stronger federal enforcement and on parallel investments in organic seed development, regional trials, and public–private partnerships. The comments reflect a shared commitment to expanding organic seed use, while not losing sight of the need to balance enforcement, market readiness, and farmer feasibility.

The sense of urgency is only increasing and the time for action is now. At the virtual meeting held in January, Deputy Administrator Dr. Jennifer Tucker made clear that NOP will only pick up the seed issue when it receives a definitive “pencils down” signal from NOSB that they have finished their work on this topic. It is our sincere hope that before CACS lays its pencil on the page, it continues to consider the extensive feedback received from a diversity of stakeholders across the supply chain. We reiterate our continued commitment to this issue and look forward to working together with NOSB to deliver a practical recommendation that meaningfully moves the community to our shared goal of greater organic seed availability and use.

Respectfully,

Organic Trade Association Seed Task Force