



April 9, 2026

Economic Research Service  
Office of the Chief Economist  
1400 Independence Avenue SW  
Washington, DC 20250-1800  
Via regulations.gov

**Docket:** ERS-2026-0001

**RE:** Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture

**Field:** Agricultural industry / trade association

**Area of Interest:** Statistics, data, forecasting, commodity markets, organic agriculture, and market analysis

The Organic Trade Association (OTA) appreciates the opportunity to respond to USDA's Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research produced by the Economic Research Service (ERS), the National Agricultural Statistics Service (NASS), and the Office of the Chief Economist's World Agricultural Outlook Board (OCE-WAOB).

OTA is the membership-based business association for the organic sector in North America. Our members span the full organic supply chain, including producers, processors, handlers, certifiers, brands, distributors, retailers, and input suppliers. Our mission is to grow and protect organic through a strong and unified voice from farm to marketplace.

USDA already produces several valuable organic data products. At the same time, the domestic organic sector still lacks the routine, timely, commodity-level supply, use, price, trade, and profitability data needed for business planning, risk management, market development, and public policymaking. For organic producers, this is not an abstract data problem. It is a competitiveness problem. Weak or incomplete market visibility creates more uncertainty for domestic farmers, makes it harder to evaluate transition and expansion opportunities, and can leave market openings to be filled by imports rather than U.S. production.

OTA's central recommendation is that USDA should build from the tools it already runs and move toward a more connected, recurring, and decision-useful organic data architecture, with organic integrated into USDA's core statistical and analytical products wherever feasible. Organic does not need a wholly separate reporting universe. It needs to be better incorporated into the one USDA already maintains for the rest of agriculture.

We offer the following responses.

**Response to Question 1 - Which NASS or ERS data (e.g., releases, reports, datasets) are most valuable to your work, and why?**

The most valuable USDA data products for OTA's work are those that combine credibility with direct operational usefulness for producers, businesses, and policymakers.

The Census of Agriculture organic tables and the Organic Survey are foundational. They have historically provided the best available federal baseline for organic acreage, production, sales, practices, and geography. OTA particularly values the Organic Survey because it is USDA's strongest dedicated vehicle for collecting detailed organic production data.

Absent more robust integration of organic data into recurring NASS reporting, AMS Organic Market News and related organic market reports are among USDA's most relevant products for the organic sector because they provide recurring market information rather than one-time structural snapshots separated by years. This is particularly important in fast-moving sectors such as dairy, grains, eggs, poultry, and specialty crops. OTA views these AMS products as some of the closest things USDA currently has to recurring organic market intelligence.

Finally, ERS organic analyses, especially the Organic Situation Report and selected cost-and-returns and ARMS-related work, are highly valuable when they synthesize production, trade, policy, and market structure. OTA finds these products most useful when they help producers and businesses understand not just what happened, but what it means for current market conditions and future decisions.

**Response to Question 2 - What gaps exist in the agricultural data produced?**

The biggest gap is not a single missing dataset. It is the absence of recurring organic market intelligence that ties together acreage, planting intentions, crop progress, production, price, stocks, use, imports, exports, and margins in a way comparable to what many conventional commodity sectors receive.

Organic producers do not need a wholly separate set of reports. They need better integration into USDA's core statistical and analytical framework, especially in recurring NASS and OCE-WAOB reporting. Without that visibility, domestic producers face more uncertainty in assessing production opportunities, market timing, and risk. In some sectors, that uncertainty can make it easier for imports to fill supply gaps that U.S. producers might otherwise be in a stronger position to serve.

Organic also faces a major gap in trade measurement. Official trade data understate the scale of organic trade where organic-specific tariff codes do not exist. USDA should work across relevant agencies to improve organic-specific HS/HTS code coverage, maintain those codes over time, and clearly communicate where trade data remain incomplete. Better organic trade visibility is essential if USDA wants to support domestic production rather than leave farmers operating with an incomplete view of the competitive landscape.

Another major gap is cost-of-production and profitability data. USDA has the tools and expertise to compare organic and conventional costs and returns, but organic coverage remains too episodic and dated across major commodities and regions. This matters because organic producers face distinct cost structures tied to feed, labor, certification, recordkeeping, transition, and infrastructure. Without better profitability data, farmers are left

making major business decisions with too little public information.

USDA data also do not sufficiently illuminate the mid-supply-chain space between farm output and retail sales. Organic farmers and businesses need better visibility into handlers, processors, ingredient flows, bottlenecks, and capacity constraints. This is especially important in organic, where certified infrastructure can be limited and where market access constraints can shape whether domestic production expands or stalls.

Data quality and data sufficiency have also been recurring issues in some organic reporting. Differences between survey-based organic acreage estimates and acreage reflected in more recent administrative reporting point to the need for stronger coverage, consistency, and methodology. Similarly, organic dairy reporting has shown the challenge of trying to build useful market visibility from thin stand-alone reporting. USDA's efforts to improve dairy price and volume transparency are appreciated, but the broader lesson is that stronger data quality and market usefulness are more likely when organic is integrated into USDA's established reporting systems rather than handled through isolated or lightly sampled efforts.

### **Response to Question 3 - What new topic areas should USDA prioritize for data products?**

USDA should prioritize five related areas, with an emphasis on incorporating organic data into existing reports and systems where practical.

First, USDA should develop recurring organic market intelligence for key commodities, including regular visibility into acreage, production, prices, movement, inventories, imports, and margins. This should be integrated into existing USDA reporting where feasible, especially in major commodity, price, and outlook products, rather than relying primarily on stand-alone organic reports – reports such as World Agricultural Supply and Demand Estimates, Agricultural Prices, Crop Progress, Crop Production, Livestock Slaughter, Egg products, Milk Production, etc.

Second, USDA should prioritize organic trade tracking, including better code coverage, clearer reporting, and stronger coordination across agencies. Domestic producers need a more accurate picture of import competition and trade flows.

Third, USDA should prioritize recurring organic cost-of-production and profitability analysis across major commodities, beginning with dairy, eggs, broilers, beef, grains, oilseeds, produce, and selected specialty crops, with regional breakouts where sample sizes support publication.

Fourth, USDA should ensure that the 2027 Census of Agriculture is structured to capture more of the nuanced information for organic agriculture that USDA already collects for agriculture more broadly, including land use, production, operator characteristics, practices, and economics. Over time, that could reduce the need for separate, narrower organic data collection exercises and improve consistency across USDA's reporting system.

Fifth, USDA should prioritize better processor, handler, and mid-supply-chain visibility to support farmer market access and production decisions. This is especially important in organic because the market is smaller, certified infrastructure is more limited, and downstream capacity constraints can directly affect whether domestic

production is viable.

**Response to Question 4 - How often should data and information be released or updated (e.g., annually, quarterly)?**

USDA should match release frequency to the decision being supported.

For fast-moving market indicators such as prices, movement, and some supply metrics, USDA should publish data monthly or biweekly where feasible. For broader economic and profitability analysis, annual or multi-year updates may be more appropriate. Five-year census products remain essential benchmark tools, but they are not sufficient on their own for business planning or responsive policymaking.

**Response to Question 5 - What geographic granularity (e.g., national, state, county) for data best supports your work?**

Organic stakeholders need multiple levels of geography.

National data are important for broad market context. State-level data are often critical for policy design, business targeting, and understanding production concentrations. County-level data can be highly valuable where confidentiality permits, especially for identifying clusters, transition opportunities, infrastructure gaps, and sales concentrations. Where suppression or sample limitations make county publication impractical, USDA should provide the lowest practical regional alternative.

Confidentiality considerations are important in all data reporting. USDA should consider both upstream and downstream disclosure risks so that reporting does not effectively reveal confidential information about individual operations or transactions.

**Response to Question 6 - Are there NASS or ERS data products, data sets, and other relevant information that are duplicative, outdated, or underutilized? What improvements, changes or consolidations could be made (e.g., more timely, different data collection methods)?**

OTA would urge caution in labeling products duplicative when the bigger problem is often fragmentation or weak discoverability. However, some products may be outdated or underutilized because they are not maintained in a way that meets current market needs.

USDA should review such products and determine whether they should be updated, consolidated into more current platforms, or re-presented in a way that better serves users.

USDA should also look for opportunities to reduce fragmentation by creating clearer crosswalks among NASS, ERS, AMS, and other USDA organic-relevant data sources so users are not forced to reconstruct a supply-chain view from disconnected tools. A more unified access point for organic-relevant data would make USDA products more useful to farmers, traders, processors, and other market participants.

**Response to Question 7 - Do you use non-USDA data to supplement data elements or variables of interest that are missing from NASS or ERS products?**



Yes. OTA and the broader organic sector frequently rely on non-USDA data because USDA does not yet provide full organic supply-chain and market visibility.

Examples include foreign government trade data, Mercaris, private retail scanner data, certifier data, and OTA's own long-running industry survey and market reporting. These sources are often used because USDA data may be absent, insufficiently current, or not specific enough for organic market decisions.

**Response to Question 9 - Which ERS or OCE-WAOB research or analytical products (e.g., farm income, situation and outlook reports, ERS research reports, WASDE) are most valuable to your work, and how do you use them?**

ERS synthesis and outlook products are valuable when they connect market structure, policy, production, and trade in a usable way. OTA especially values the Organic Situation Report and broader economic context tools, including ARMS-related analysis and Farm Income and Wealth Statistics, even where organic is only partially visible. OTA uses these products to understand market structure, evaluate policy needs, and frame industry priorities. Their value, however, declines when they are not timely.

OCE-WAOB products are influential benchmarks for conventional agriculture, which is precisely why their limited relevance to organic is notable. Organic is often effectively absent from that outlook architecture. OTA believes USDA should begin closing that gap over time. Doing so would be one of the most meaningful ways to help domestic producers better understand market opportunity and make sound business decisions about whether and how to participate in organic markets.

**Response to Question 10 - What emerging policy or economic issues should be addressed in ERS or OCE-WAOB economic analysis, outlook, and forecasts?**

USDA should give greater attention to issues affecting domestic organic market development, including domestic supply gaps and import dependence, certification and compliance costs, infrastructure bottlenecks, farm profitability, feed and input cost volatility, region-specific transition economics, changes in processor and handler concentration, and the relationship between market transparency and domestic production growth.

**Response to Question 11 - When using ERS or OCE-WAOB forecasts or research, are you more likely to use raw data files, written analysis, or both?**

OTA uses both. Raw data files are essential for internal analysis, advocacy support, and deeper interpretation. Written analysis is equally important because many producers, businesses, and decision-makers need clear narrative interpretation before digging into underlying tables. Strong written analysis helps make the data more useful to a broader agricultural audience.

**Response to Question 12 - How can ERS and OCE-WAOB better tailor the content to your needs?**

ERS and OCE-WAOB can better serve organic stakeholders by providing more organic-specific, commodity-level, recurring analysis and by incorporating organic breakouts into current reporting where feasible. USDA should not assume that because organic is smaller than conventional sectors, it can be addressed only through occasional specialty studies. That approach leaves domestic producers with less visibility and less certainty than their conventional counterparts.

**Response to Question 13 - How could ERS and OCE-WAOB improve transparency of the data sources, assumptions, methodology, or models used in economic forecasts?**

For organic in particular, USDA should be explicit about incomplete trade coverage, sparse samples, modeled estimates, and cases where products rely on indirect rather than direct observation. Greater transparency about limitations would help users better interpret the data and would also help build confidence in the products over time.

**Response to Question 14 - How do you currently access ERS, NASS, or OCE-WAOB data? What challenges do you face when accessing data or research? What improvements would you suggest?**

OTA accesses USDA data through Quick Stats, agency websites, downloadable reports, dashboards, and other public interfaces. The main challenge is that organic-relevant data are often difficult to find, connect, and compare across USDA systems.

USDA should improve findability by offering clearer organic landing pages, better search and filter tools, and crosswalks among relevant NASS, ERS, AMS, and other USDA products.

**Response to Question 15 - What tools or formats would improve usability of ERS, NASS, and OCE-WAOB products?**

USDA should prioritize machine-readable downloads, stable APIs where feasible, downloadable tables, saved queries or presets for organic users, clearer metadata, and dashboards that supplement rather than replace downloadable data.

**Response to Question 16 - Are there groups (e.g., beginning farmers, small businesses) that face challenges using ERS, NASS, and OCE-WAOB data and analytical products? How can we improve access?**

Yes. Smaller businesses, beginning farmers, transitioning producers, and users without dedicated in-house analysts may face challenges using USDA data. Better access would come from easier discovery, clearer interfaces, plainer methodological explanations, better-organized landing pages, and practical tools tailored to real decision-making rather than only expert data use.

**Response to Question 17 - How useful are associated tools such as Quick Stats, ARMS dissemination tools, Amber Waves, Charts of Note, WASDE data visualization, and similar products? What formats or presentation styles work best?**

OTA finds these associated tools useful when they improve access without sacrificing substance. Quick Stats is especially valuable as a core access tool. Visual products and summaries are helpful for orientation and communication, but they work best when paired with downloadable underlying data and clear methodological context.

**Response to Question 19 - Are there other data or analytical products or reports produced by other parts of USDA that you consider highly valuable, duplicative, or redundant? Are there any improvements that you would suggest?**

Yes. OTA considers AMS Organic Market News, the Organic Integrity Database, the FAS Global Agricultural Trade System databases, and certain trade-relevant and administrative datasets to be highly valuable. The problem is



often not redundancy, but that these resources are not yet integrated into a coherent public-facing organic data system. OTA encourages USDA to better connect these tools and translate administrative infrastructure into more usable market intelligence where appropriate.

Organic dairy provides a useful example of the broader issue. When routine public reporting on production, farmgate prices, feed costs, and regional conditions is limited or thin, producers are left with less ability to assess profitability, plan investments, or respond to market shifts. USDA should apply that lesson more broadly across organic agriculture.

### **Conclusion**

OTA appreciates USDA's willingness to solicit public input on the future of its statistical and analytical work. USDA already has important building blocks in place. The next step is to connect them, improve them, and begin treating organic data as core agricultural infrastructure rather than an occasional specialty exercise.

For domestic organic producers, better USDA data is not simply a research benefit. It is part of creating a fairer and more functional marketplace. Producers should not have to make major business decisions with weaker public market visibility than the rest of agriculture. USDA should build from existing tools and prioritize recurring, decision-useful organic market transparency, trade tracking, and economic analysis that better supports domestic production.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tom Chapman".

Tom Chapman  
Co-CEO  
Organic Trade Association