



May 4, 2026

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

Docket: AMS-NOP-25-0914

RE: Materials Subcommittee Discussion Document: Research Priorities

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 use of the Research Priority Framework and the efforts to set priorities. We particularly thank the Subcommittee for considering the suggestions we offered in response to Spring 2025 discussion document and inclusion of these topics, along with the new category to capture interdisciplinary topics moving forward. We offer the following feedback on this year's list.

Seed and Planting Stock

We recognize the inclusion of planting stock and seeds in the Crops section (#9 and #11 respectively), however we believe these priorities could be further strengthened by inclusion of greater detail of the data identified by the OTA Seed Task Force. The Task Force has highlighted that accurate seed demand and crop acreage data are severely lacking. Before greater organic seed production and adoption can be expected, additional research and understanding of this data is required, and would benefit from inclusion in the priorities list.

Aligning Priorities with USDA and Outreach to NIFA

The annual NOSB Research Priorities proposal represents research needs informed by those who know them best, the organic operations across the supply chain. This industry also has deep connections with USDA and the research priorities set by the agency, with which we see opportunity for greater alignment. Reviewing the priorities outlined in USDA Secretary Rollins' [December 30, 2025 release](#), it is easy to see



parallels between the two lists: Increasing Profitability of Farmers and Ranchers, Expanding Markets, Protecting the Integrity of American Agriculture from Invasive Species, Promoting Soil Health to Regenerate Long-Term Productivity of Land, Improving Human Health.

OTA is concerned that NOSB research priorities appear to have been deemphasized within USDA research and extension planning in the latest notice of funding opportunity. The NOSB process provides a unique public and sector-informed mechanism for identifying practical research needs that directly affect organic production, handling, certification, and market development. We encourage the NOSB to renew engagement with USDA's Research, Education, and Economics mission area and NIFA leadership to ensure these priorities are understood, elevated, and better connected to organic research programs, including OREI and related competitive grant opportunities. This renewed dialogue would help ensure that research priorities identified through the NOSB process are visible to USDA research decision-makers and better positioned to inform investments that advance organic agriculture. This is a relationship that has proven fruitful in the past and with new leadership at NIFA, as well as NOSB seeing a number of new members, we see fresh opportunity for discourse.

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 list to help advance the organic sector.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott Rice", is positioned above the typed name.

Scott Rice
Sr. Director, Regulatory Affairs
Organic Trade Association

cc: Tom Chapman
Co-CEO
Organic Trade Association