



August 26, 2025

The Honorable Brooke Rollins  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Ave SW  
Washington, DC 20250

**RE: Feedback on Proposed USDA Reorganization Plan Outlined in the Secretary's Memorandum of July 24, 2025 (SM 1078-015)**

Dear Secretary Rollins,

Thank you for this opportunity to comment on the U.S. Department of Agriculture's proposed reorganization plan as outlined in Secretary Memorandum SM 1078-015. 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 supports the Administration's goal of improving efficiency and effectiveness across the federal government. We share USDA's goal that the reorganization should not undermine the customer service, technical expertise, or responsiveness of the key agencies that support organic agriculture. Particular focus should be placed on ensuring that any relocation or restructuring of staff preserves the capacity and institutional coordination of the Agricultural Marketing Service (AMS), Foreign Agricultural Service (FAS), National Institute of Food and Agriculture (NIFA), and Agricultural Research Service (ARS). These agencies are essential to maintaining organic standards, enabling trade, supporting research, and advancing the sector's continued growth and integrity. USDA must ensure that any reorganization maintains, rather than disrupts, the high level of service and interagency collaboration that organic stakeholders depend on.

**1. Agricultural Marketing Service (AMS) and the National Organic Program (NOP)**

The National Organic Program, a program within AMS, serves as the federal regulator of the USDA Organic label and certification system. It ensures that organic standards are consistently enforced, accredits and oversees third-party certifiers, coordinates with trading partners, investigates complaints, and maintains public trust in the organic seal. NOP is a unique regulatory program with voluntary participation but mandatory compliance. It manages a large, complex compliance system across the U.S. and dozens of countries. This demands consistent and credible oversight, both in the field and at USDA headquarters. Without a strong, functioning NOP, the organic marketplace would be under threat. This would result in missing opportunities to capture domestic value, expand market diversification, and advance the consumer health priorities aligned with the Make America Healthy Again (MAHA) Commission.

The implementation of new rules within NOP is a coordinated effort across its divisions. Once the Standards Division finalizes regulatory updates, the Accreditation Division ensures certifiers update their procedures and USDA adjusts its oversight accordingly. The Compliance and Enforcement Division then monitors adherence, investigates violations, and ensures enforcement. Meanwhile, the communications team informs the marketplace through updated guidance, webinars, and outreach. Throughout this process, NOP regularly consults with other federal entities, including the Office of Management and Budget (OMB), U.S. Customs and Border Protection (CBP), Animal and Plant Health Inspection Service (APHIS), Environmental Protection Agency (EPA), Department of Health and Human Services (HHS), Federal Trade Commission (FTC), and other USDA offices. This internal and interagency coordination is critical to ensuring effective and timely implementation of new organic standards.

We recognize that much of the accreditation, auditing, and compliance work is already conducted by NOP's regional staff, who are appropriately stationed close to certifiers and certified operations. These field-based roles function best in the field close to farmers, ranchers and business. As USDA considers future workforce planning, it is also important that NOP retains the flexibility to hire field-based staff where appropriate to support cost-of-living goals, attract top talent, and ensure long-term affordability and accessibility for both the agency and its workforce. However, it is essential that the policy, enforcement, and standards staff currently located in the National Capital Region remain accessible and integrated into the federal rulemaking and enforcement framework. These professionals play a vital role in:

- Responding to complex compliance cases and ensuring consumer confidence in the organic brand;
- Interfacing with the Office of the General Counsel, the National Appeals Division, and Congress;
- Drafting and updating regulations in coordination with the National Organic Standards Board, the general public, HHS, EPA, USDA leadership, other USDA departments, and OMB;
- Interfacing with APHIS, CBP, and the Department of Homeland Security on oversight of organic imports;
- Working with the Foreign Agricultural Service and the U.S. Trade Representative on international organic trade concerns;
- Supporting rule implementation across the globe for all USDA-accredited certifiers; and
- Providing customer service and technical expertise to the organic industry.

Relocating these core teams out of Washington would likely result in a significant loss of institutional expertise and, in many cases, the departure of senior staff. The loss of this institutional memory would directly impact the program's ability to oversee a growing and increasingly global market. The USDA Organic seal represents over \$71 billion in annual domestic sales. The seal is foundational to many farm-to-retail markets and is among the most trusted food labels by consumers. USDA must ensure that NOP's organizational placement and staffing strategy support the continued credibility and scalability of the program.

## 2. Foreign Agricultural Service (FAS)

The U.S. organic sector is deeply tied to global markets. Certified U.S. organic products are exported to more than 100 countries, and a significant portion of organic supply chains depend on both imports and exports. FAS plays a critical role in managing the international dimensions of the organic label, including:

- Negotiating and maintaining organic equivalency arrangements with trade partners (e.g., Canada, EU, UK, Japan, South Korea, Taiwan, Switzerland);
- Resolving trade disruptions related to labeling, certification access, and regulatory divergence;
- Supporting the expansion of export opportunities for U.S. organic farmers and food companies;
- Coordinating across USTR, the State Department, and USDA leadership on technical agricultural trade issues.

Relocating or decentralizing Washington-based FAS staff risks severing the tight coordination needed between FAS, NOP, USTR, and trading partners. Organic equivalency agreements require sustained regulatory dialogue, rapid issue resolution, and technical clarity, especially as more countries implement or revise their own organic laws. FAS staff also rely on the proximity to foreign trade officials posted at D.C. embassies as an additional channel for both trade dispute resolution and market expansion. OTA frequently works with FAS staff to navigate these evolving landscapes and to ensure market continuity for our members.

FAS also serves as a central hub for Foreign Service Officers between posts. These officers carry institutional knowledge about global agricultural systems and often manage complex certification and phytosanitary trade issues while stationed abroad. Maintaining their connection to a D.C.-based leadership structure is essential for effective training, alignment with USDA priorities, and continuity across international assignments.

### **3. National Institute of Food and Agriculture (NIFA)**

NIFA's research, education, and Extension grantmaking serves as a critical foundation for innovation and advancement in organic agriculture. Organic systems often face unique challenges, such as limited access to approved inputs, complex rotation requirements, or pest management strategies that prohibit synthetic materials. NIFA-supported, congressionally mandated programs like the Organic Research and Extension Initiative (OREI), help producers and researchers address these challenges and create scalable, science-based solutions. While NIFA has already undergone reorganization and relocation in recent years, further restructuring must prioritize stability and staff retention to protect the continuity of grantmaking and stakeholder engagement.

### **4. Agricultural Research Service (ARS)**

ARS supports long-term, applied research critical to public agricultural systems, including organic agriculture. ARS conducts organic research at several of its locations, including: Ames, IA; Beltsville, MD; Beaumont, TX; Booneville, AR; Brookings, SD; Dawson, GA; Geneva, NY; Ithaca, NY; Kearneysville, WV; Lane, OK; Morris, MN; Orono, ME; Parlier, CA; Prosser, WA; Salinas, CA; Shafter, CA; Stoneville, MS; Tifton, GA; Urbana, IL; Wenatchee, WA; and Wyndmoor, PA. As USDA considers facility closures such as the Beltsville Agricultural Research Center (BARC) where organic research is conducted, OTA urges the Department to carefully evaluate the downstream effects on collaborative science and institutional knowledge. Research on organic land, including long-term trials in Beltsville, MD, has demonstrated the value of sustained organic management. The loss of land dedicated to this research could be highly disruptive. Whatever the future of ARS may be, organic research must remain a priority within any successor institution, and changes should minimize disruption wherever possible. OTA urges the Department to ensure that the reorganization strengthens rather than diminishes the agency's ability to collaborate with other research institutions, academic partners, and industry stakeholders on these vital projects.

### **Other USDA Program Areas Supporting Organic Agriculture**

In addition to the core agencies described above, the success of the organic sector also relies on effective coordination and delivery of services through other USDA agencies, including the Risk Management Agency (RMA), Farm Service Agency (FSA), and Natural Resources Conservation Service (NRCS).

- RMA plays a central role in expanding access to crop insurance for organic producers. The continued development and administration of organic-specific price elections and whole-farm revenue protection options depend on knowledgeable staff and responsive systems. As USDA reviews internal staffing structures, it is important to ensure that RMA maintains expertise on organic production risks and remains accessible to producers nationwide.

- FSA supports the organic community through programs such as the Congressionally mandated Organic Certification Cost Share Program (OCCSP), conservation assistance, and farm loan programs. These resources are often essential to small and mid-sized organic operations. Any reorganization should preserve efficient, regional delivery of these services to ensure organic operations continue to benefit from FSA programs.
- NRCS supports organic transition and long-term soil health through conservation planning and programs like EQIP and CSP. Ensuring that NRCS field staff retain training in organic systems and maintain coordination with NOP and Extension is vital for helping farmers implement practices that align with organic standards.

Together, these agencies provide essential technical and financial support to organic producers, and their continued engagement is necessary to meet USDA's goals for an America first, economically resilient, and market-aligned agriculture.

## Conclusion

The success of USDA's reorganization will depend on its ability to modernize without disrupting programs that are already working. For the organic sector, this means preserving NOP's experienced policy and enforcement teams, maintaining FAS's centralized trade capacity, ensuring NIFA can support organic research, and safeguarding ARS's infrastructure and institutional expertise. OTA appreciates the opportunity to provide input and stands ready to partner with USDA to ensure organic agriculture remains well-supported during this transition.

Sincerely,



Tom Chapman  
Co-CEO



Matthew Dillon  
Co-CEO