



April 1, 2022

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

**Docket:** AMS-NOP-21-0087

**RE: CAC Subcommittee – Discussion Document on Modernization of Organic Traceability Infrastructure**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the National Organic Standards Board (NOSB) Compliance, Accreditation & Certification Subcommittee's Discussion Document on Modernization of Organic Traceability Infrastructure.

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, representing over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

The Subcommittee is exploring whether to require reporting of crops by acreage on organic certificates. Currently there are no means to accurately calculate organic acreage and/or yield estimates on a regional or country-by-country basis. This hinders the ability of NOP, State Organic Programs, certifiers, and inspectors to evaluate the total volume of organic product coming from any given region and accordingly detect whether fraud is occurring. A requirement for certifying agents to report certified organic production by crop/livestock and location, on an at least an annual basis, to the NOP Organic INTEGRITY Database is one of the most impactful single actions that can be taken to increase the integrity in the global organic control systems. However, OTA is sensitive to confidential business information and therefore expects that USDA will continue its practice of aggregate reporting to the public. **Reports and data visible to the public must only include aggregated data in a manner to protect confidential business information.**

OTA also refers the Subcommittee to our previous fall 2021 comments<sup>1</sup> identifying specific information needed for OTA to engage in any discussion about the use of electronic tracking systems and the best way to modernize organic supply chain traceability, as follows:

1. A final SOE rule so we can tether the conversation to a known outcome and better identify holistically where the gaps are and what is needed;
2. A detailed accounting on how the \$5 million from the 2018 Farm Bill was spent; and
3. A detailed update on the status of electronic import certificates and the CBP-ACE system.

<sup>1</sup> [https://ota.com/sites/default/files/indexed\\_files/OTA\\_CAC\\_SupplyChainOLS\\_Fall2021\\_AMS-NOP-21-0038\\_Final.pdf](https://ota.com/sites/default/files/indexed_files/OTA_CAC_SupplyChainOLS_Fall2021_AMS-NOP-21-0038_Final.pdf)



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,

A handwritten signature in black ink that reads "Johanna Mirenda".

Johanna Mirenda  
Farm Policy Director, OTA

cc: Laura Batcha  
Executive Director/CEO, OTA