Exhibit B
Pursuant to 28 U.S.C. § 1746 I, declare:

1. I am the Chief Executive Officer of the National Co+op Grocers. This statement is based on my personal knowledge and upon information and belief.

2. National Co+op Grocers (“NCG”) is a business services cooperative for retail food co-ops located throughout the United States. We represent 146 food co-ops operating over 200 stores in 38 states with combined annual sales over $2 billion and over 1.3 million consumer-owners.
3. NCG helps unify natural food co-ops in order to optimize operational and marketing resources, strengthen purchasing power, and ultimately offer more value to natural food co-op owners and shoppers everywhere.

4. Through its partnerships with organic advocacy groups, NCG frequently presents expert opinion testimony at public meetings conducted by the National Organic Standards Board. (“NOSB”).

5. Our association, and its members frequently submit comments on proposed rules issued by the USDA’s National Organic Program.

6. NCG prioritizes implementing strong organic standards, because strong organic standards are imperative to the success of our business. Consumer confidence in the USDA Certified Organic seal is foundational to our industry. NCG recognizes organic as the gold standard of consumer food labels, because it represents a federally regulated guarantee that food has been produced in a transparent and sustainable way. On average, certified organic product comprises roughly 40% of NCG retail grocery stores’ total annual sales.

7. Our customers expect organic products to meet or exceed the organic standards, including animal welfare provisions for consistent, meaningful outdoor access and indoor space that allows animals to express natural behaviors. If the organic standards are not met, and thereby our customers lose faith in the organic standards and animal welfare provisions therein, this would be an irreparable harm to all cooperative stores that sell organic products.

9. When USDA issued its second delay of the final rule, we submitted a letter to Paul Lewis, Director, Standards Division at the USDA National Organic Program, that said, “While the vast majority of organic producers already adhere to strong animal welfare standards, this rule closes existing loopholes and levels the playing field for organic producers, ultimately ensuring that USDA Certified Organic can continue to meet evolving consumer expectations…Any further delay [of the final rule] could significantly erode consumer trust in the organic label, which is the basis not only for organic’s double-digit sales growth, but also fosters a unique, consumer-driven marketplace that allows producers to earn an economically significant premium.”

10. NCG continues to support immediate implementation of the final rule.

11. Withdrawing this final rule or continuing to delay its implementation harms and will continue to harm NCG and could lead to profound disruption to the marketplace for certified organic products by irretrievably damaging consumer trust in the USDA organic seal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13\textsuperscript{th} day of September 2017.

\[\text{Signature}\]

Robynn Shrader, National Co+op Grocers