



September 28, 2023

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

Docket: AMS-NOP-23-0026

**RE: Compliance, Certification, and Accreditation Subcommittee Discussion –
Improving Support for Organic Transition**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the National Organic Standards Board (NOSB) Certification, Accreditation, and Compliance (CACS) Subcommittee’s discussion document, Improving Support for Organic Transition.

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 organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers’ associations, distributors, importers, exporters, consultants, retailers and others. OTA’s Board of Directors is democratically elected by its members. 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 CACS has created a work agenda item on improving support for transitioning producers and optimizing use of resources for transition to organic. The stated purpose of the discussion document is to gather feedback from inside and outside the organic community on effective tools, resources, and alignment strategies to support organic transition and requirements for participation in programs that support organic transition. Additionally, the CACS acknowledges there is a need for deeper understanding of how improvements in diversity, equity, and inclusion in the organic sector could expand the relevance of organic. We wholeheartedly agree and support this work.

In 2021, OTA initiated a Diversity Council with a focus on Justice, Equity, Diversity, and Inclusion (JEDI) within the organic industry. It aims to make a conscious effort to ensure that our successes within the organic movement promote diversity rather than perpetuate social inequalities. Members are working to develop practices and processes that embed justice, equity, diversity, and inclusion into the fabric of OTA and the organic movement.

In response to the Subcommittee’s request “What can be done to foster a more diverse, equitable, and inclusive organic sector?” we invite you to visit the [Diversity Council page](#) of our website, where you can review OTA’s [2022 Diversity Initiative Report](#). This report highlights the great work already underway under the leadership of our council, including a Diversity and Entrepreneurship Program, a Diversity Fellowship, the creation of a resource library, and a partnership with the Black Farmers Index aimed at helping to diversify our members’ supply chains through the Index directory’s more than 1,200 Black agriculturists in the U.S. We look forward to further work from the Council that helps grow a diverse organic sector and supports the dedicated work of those in transition to organic.

In closing, and 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 protecting organic integrity across the supply chain.

Respectfully submitted,



Scott Rice
Regulatory Director
Organic Trade Association

cc: Tom Chapman, CEO
Organic Trade Association

Attachment: OTA Diversity Council Annual Report 2022

Diversity Council Annual Report | 2022

Formed in 2021, the **Organic Trade Association (OTA)**'s **Diversity Council** aims to make a conscious effort to ensure that our successes within the organic movement promote diversity rather than perpetuate social inequalities. Members work to develop practices and processes that embed justice, equity, diversity, and inclusion (JEDI) into the fabric of OTA and the organic movement.

2022 Highlights:



The Council created the Diversity Resource Library.

- The Library is a repository of over 150 resources to aid in the work of creating and more diverse and representative organic trade.
- OTA members and the public can look to this resource library as a first stop when diversifying their conferences, businesses, supply chains, marketing, and more.



The Council sponsored two events to help strengthen its coalitions with other diverse organizations.

- OTA participated in two panels and translated resources on organic transition and certification materials into Spanish for the first time for the National Latino Farmers and Ranchers Conference.
- As a sponsor of the We Are Still Here (WASH) Conference, the Council participated in a convening of 25 Black-owned farms and businesses to hear firsthand the barriers keeping them out of the supply chain and the organic trade.



The trade association entered into a memorandum of understanding (MOU) with the Black Farmers Index, welcoming them to the Diversity Council.

- Black Farmers Index is the largest, free, most comprehensive directory of Black Farmers, connecting you to traditional and non-traditional growers.
- The common objective of the MOU is to promote OTA's programming.
- The goal is to increase enrollment in the Diversity and Entrepreneurship Program, which assists farmers in becoming certified organic.

Looking Ahead to 2023:

In 2023, the Council will focus on internal accountability and outreach. Among the pillars of OTA's JEDI work is to hold ourselves accountable. Along with OTA continuing its participation in a 21-Day Racial Equity Challenge, staff will complete practitioner-led work to further our collective goals towards equity and inclusion. Also, OTA will participate in more outreach by attending and speaking at conferences held by Historically Black Colleges and Universities (HBCU) and other BIPOC-led organizations, with the intent of greater coalition building.

COUNCIL MEMBERS



Change Your Food - Change Your Life!™ Inc



Fig Hill Consulting



Good JuJu Brands



Karlin Strategic Consulting, LLC



Oyster Bay Farm



Plant Odyssey

Practical Botanicals



Staley Farms LLC



Kelli Tubman White



Kellee James (Mercaris) serves as the Chair of the Diversity Council, alongside Carla Balen (Organically Grown Company) as Vice Chair. Stephanie Jerger, OTA's Vice President of Administration, is the staff liaison to lead its work. To join the Diversity Council, please contact Stephanie (sjerger@ota.com).



Headquarters: 444 N. Capitol St. NW, Suite 445A, Washington, DC 20001 (202) 403-8520
 OTA.com | info@ota.com | @OrganicTrade
 Locations: Washington, D.C. | Brattleboro, VT | Santa Cruz, CA | Corvallis, OR