November 9, 2023

The Honorable Debbie Stabenow
Chairwoman
Committee on Agriculture
U.S. Senate
Washington, D.C., 20510

The Honorable Glenn “GT” Thompson
Chair
Committee on Agriculture
U.S. House of Representatives
Washington, D.C., 20515

The Honorable John Boozman
Ranking Member
Committee on Agriculture
U.S. Senate
Washington, D.C., 20510

The Honorable David Scott
Ranking Member
Committee on Agriculture
U.S. House of Representatives
Washington, D.C., 20515

RE: Orphan Programs in Farm Bill Extension

Dear Chairwoman Stabenow, Chairman Thompson, Ranking Member Boozman, and Ranking Member Scott:

The Organic Trade Association (OTA) urges you to carefully consider the inclusion of organic “orphan programs” which are not covered in the baseline in any extension of the Farm Bill. These programs are important to the continued operation of the organic program and the cessation of operations of the Organic Certification Trade and Tracking (OCTT) program, the Organic Data Initiative (ODI), and the Organic Certification Cost Share Program (OCCSP) for an entire year without alternative funding mechanisms would be detrimental to the continued growth of organic.

OTA is the largest membership-based business association for organic agriculture and products in North America - representing $67 billion in sales in the United States. Through direct membership and its Farmer’s Advisory Council, it is the leading voice for organic trade in the United States representing over 10,000 farms and businesses across the supply chain and all 50 states.

We recognize you collectively face difficult decisions as you attempt to provide some certainty to the farming community for the upcoming calendar year while you continue to work on crafting a final Farm Bill and providing long term policy direction for the U.S. Department of Agriculture (USDA).

OCTT (Section 10104) is an important part of the fraud prevention initiatives undertaken by USDA and will be utilized by the recently implemented Strengthening Organic Enforcement (SOE) rule to ensure the integrity of imported goods to the United States market and make certain consumers are receiving bona fide organic goods. This rule goes into effect on March 19th, 2024, and ongoing technological updates to the database are critical and necessary during this period of
implementation. Without sufficient funds, the measures directed by Congress in the 2018 farm bill to protect American farmers and consumers will be put at risk.

ODI (Section 10103) is a multi-agency organic data collection initiative that collects information vital to maintaining stable markets, creating risk management tools, and assisting in negotiating equivalency agreements with foreign governments. Congress has historically directed the USDA to improve organic reporting, and removing this funding would move organic data collection in the opposite direction of Congressional intent. In addition, without timely access to this data, current organic farmers and those looking to transition to capture market premiums are put at a disadvantage when making decisions about farm investments or planting.

OCCSP (Section 10105) aids farmers in obtaining or renewing their organic certification, up to 75% or 750 dollars per certification scope. This assists smaller and mid-size operations with costs, which have risen with increased verification requirements and fraud prevention. Without this program, organic farmers will see their costs rise.

We ask that you consider finding the offsets necessary to continue the operations of these programs at USDA. Doing so will enable our members to continue creating economic opportunities for producers in rural areas, contributing to environmental improvement, market diversification, and ensuring domestic agricultural resilience.

Thank you for consideration of our request. If you or your staff have additional questions or need further information, please contact Peter J. Mihalick, Esq., Senior Director of Government Affairs, at 202-341-3311 or pmihalick@ota.com.

Sincerely,

Tom Chapman
CEO and Executive Director
Organic Trade Association