

ORGANIC TRADE ASSOCIATION (OTA) FACT SHEET ADDRESSING RECENT WASHINGTON POST ARTICLE ON ORGANIC

- Anyone has the right to submit a comment to the National Organic Program if they have reason to suspect a violation of the organic standards. Every one of these complaints are investigated by USDA and the operation's certifier to determine whether the suspected violation had, in fact, occurred. OTA has full confidence in the USDA investigation process.
- Complaint procedures require a thorough investigation with the operation's certifying agent, and if the suspected violation is confirmed the operation could be subject to financial penalties up to \$11,000 per violation or suspension or revocation of its organic certificate.
- Allegations do not necessarily mean violations. Due process is a critical element of the organic certification system, and the process for investigating complaints is no different.
- Aerial photos do not substitute for boots-on-the-ground inspections and records review, which is how organic compliance is verified. Each of the operations implicated in Cornucopia's complaints have been inspected by accredited organic certifiers every year that they have been certified organic. These inspections must occur at a time when the daily activities of the operation can be observed by the inspector. The inspector also reviews the operation's records, which must demonstrate full compliance with the standards, including access to the outdoors for poultry operations and access to pasture for dairy and beef operations.
- Organic standards are scale neutral, and any operation in possession of an organic certificate has been inspected and determined to meet the organic regulations by a third party accredited certifier.
- Currently, rulemaking on animal welfare standards are being pursued by NOP. Implementation of the "pasture rule" in 2010 clarified how much grass an organic cow must eat from the pasture, previously a grey area in the organic standards. Similarly, rulemaking on animal welfare will clarify additional grey areas and ensure that all organic animals have a basic quality of life.
- All certified organic livestock and poultry are raised in operations that comply with the organic regulations and that are regularly inspected by their third party accredited certifiers, regardless of whether there is a red barn in the background or not.
- The organic industry and its certification system engages in a constant exercise of self-improvement. Organic stakeholders are constantly looking at ways to make the system better and support sound regulations that help the industry adhere to the highest standards of quality and safety.