



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