



April 26, 2017

George Ervin "Sonny" Perdue III  
Secretary, U.S. Department of Agriculture  
Jamie L. Whitten Building  
1400 Independence Avenue, SW  
Washington DC, 20250

Dear Secretary Perdue:

On behalf of the Organic Trade Association (OTA), I want to thank you for recognizing the broad consumer support for organic across the country during your confirmation hearing before the U.S. Senate Committee on Agriculture, Nutrition & Forestry. Congratulations on your confirmation this week as Secretary of Agriculture. We voiced support for your swift confirmation and are pleased that you have now officially taken the helm at USDA.

The future of agriculture is at a critical juncture, and the enormity of issues facing production agriculture today is perhaps more significant than at any time within the past 25 years. Leadership will require thoughtful deliberation to assess the areas on which to focus attention with reduced resources. OTA stands ready to assist you wherever common interests exist that will enhance opportunities to ensure a vibrant future for all American farmers.

The Organic Trade Association is a membership-based organization comprising the entire organic value chain of farmers, processors, distributors, retailers and others. Our mission is to promote and protect organic with a unifying voice and ensure strong organic standards across the globe. U.S. organic sales were \$8.6 billion in 2002, when the USDA organic seal was first introduced, and grew to over \$43.3 billion by the end of 2015. Organic has posted double-digit growth in each of the last five-years, including 11 percent growth in 2015 <sup>1</sup>. Organic farms, suppliers and handlers are creating jobs across the country, including expanding, opening and retooling handling, manufacturing and processing facilities. Sixty percent of organic businesses reported their operations had increased full-time employment during 2015 <sup>2</sup>.

Organic is a voluntary program for producers and handlers who choose to commit to meeting a consistent federal standard in return for the ability to market their products under the USDA organic seal. The program is not mandatory, but provides uniform standards and enforcement for those who want to participate. The market, based on consumer demand, rewards businesses that opt in with a premium price.

A top priority and urgent issue that will require attention in your first weeks leading USDA will be the Organic Livestock and Poultry Practices (OLPP) Rule, set to become effective on May 19. According to a survey by Organic Egg Farmers of America from 2014, a vast majority of organic egg producers representing the majority of organic egg production in the U.S. already adhere to the practices and standards set forth in the rule <sup>3</sup>. A recent Consumer Reports survey found that 83

percent of consumers who frequently purchase organic products believe that organic eggs should come from hens that have access to the outdoors<sup>4</sup>. Additionally, USDA's APHIS has found no significant differences in mortality rates between organic and conventional laying hen operations. Support for this rule was clear throughout numerous public comment periods by organic livestock producers as well as major and growing organic brands and retailers. The organic industry developed the standard through the National Organic Standards Board—the federal advisory committee process mandated by Congress in the Organic Foods Production Act. This advisory committee recommends and advises the Secretary on organic standards. The practices for organic livestock and poultry are a result of over a decade of conversations and recommendations by this advisory board. Although it can be a laborious process to find industry consensus, the integrity of the public-private partnership must be respected. Further delay will significantly disrupt the public trust in the USDA Organic seal and perpetuate the status quo in which conflicting and inconsistent interpretations by certifying agents has created an uneven playing field, both of which are of great concern to the organic industry including livestock producers.

Competition and choice are the bedrocks of the entire American economy. Now more than ever, consumers drive demand in the marketplace as the U.S. food and agriculture industries continue to evolve and deliver these products. For a healthy market for organic products to thrive, a clear market distinction backed by a trusted, verified and enforced claim is required. Without this clear market distinction, the standard does not exist.

OTA applauds the work done to provide adequate adjustment time for producers by including an ample implementation schedule as part of the final rule. Our members have directed OTA to set the highest priority on OLPP making it over the goal line. We urge the Secretary to ensure the rule becomes effective on May 19 without further delay.

We stand committed to working with you on issues where we can be of assistance that will benefit and safeguard organic agriculture, and, in return, the greater agriculture industry as a whole. Organic is good for rural communities, jobs, and the entire U.S. economy. We look forward to working with you and your team to foster increased opportunities for American farmers and consumers across the United States.

Sincerely,

Laura Batcha  
Executive Director/CEO  
Organic Trade Association

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<sup>1</sup> The Organic Trade Association's 2016 *Organic Industry Survey*

<sup>2</sup> The Organic Trade Association's 2016 *Organic Industry Survey*

<sup>3</sup> Organic Poultry Industry Animal Welfare Survey; Organic Egg Farmers of America, 2014

<sup>4</sup> "Consumer Reports survey finds consumers think it's important to have high animal welfare standards for organic food"  
<https://consumersunion.org/news/consumer-reports-survey-finds-consumers-think-its-important-to-have-high-animal-welfare-standards-for-organic-food/>