

Dear Representatives Newhouse, Panetta, Valadao, Carbajal, and Pingree:

The coalition consisting of the Organic Trade Association, the Specialty Crop Farm Bill Alliance, the National Organic Coalition, the Organic Farmers Association, and the Organic Produce Association is writing today in support of H.R. 5973, the Continuous Improvement in Organic Standards Act (CIAO) of 2023, which would establish a consistent, transparent, and predictable process for regulatory updates to organic practice standards.

These groups represent the entire organic supply chain from farmers and growers, handlers and brands, retailers, consumer and environmental interest groups along with others with interests in the long-term success of the organic sector. Together they represent a \$67 billion marketplace, which continues to achieve significant growth year after year.

The organic market is a success story of a public-private partnership - where the government provides legitimacy in a consumer-facing label and works together with stakeholders on agreed upon practice standards. An underlying tenet of organic is the continuous improvement, based on the latest developments in practice, emerging research, and a desire to meet the changing needs of a growing consumer base. Unfortunately, this practice has not been reflected much in the recent past as the industry has matured and stakeholders continue to be frustrated by the pace at which new standards are developed and existing ones are updated to reflect any changes. Lately, most of the new standards have resulted from either Congressional action, an audit by the Inspector General, or a private action lawsuit. Neither of these mechanisms are favored by the industry as they are unpredictable and create an antagonistic relationship with the agency overseeing the organic program.

The CIAO Act of 2023 solves this problem. The legislation essentially creates a two-step process in which a prioritization plan is developed with stakeholder input and the existing advisory committee, the National Organic Standards Board (NOSB), by the agency with the authority, the National Organic Program (NOP). Then the NOP utilizes the Administrative Procedures Act to solicit stakeholder input on the substance of the updates established by the work plan and finalizes them. The process then repeats on a five-year basis, ensuring that the government and stakeholders can identify issues and work together to address them using the latest information at their disposal. This provides enhanced opportunities for stakeholders to offer feedback and will offer comfort knowing that potential problems can be addressed before too long and implementation can be scaled to accommodate compliance costs and be more manageable for the supply chain. This process reflects other mechanisms within the Organic Foods Production Act, such as the materials list, which are updated on a similar five-year timeline.

The coalition supports the passage of the Continuous Improvement in Organic Standards Act of 2023 to bring much-needed transparency and predictability to the process. The coalition thanks Reps. Dan Newhouse, Jimmy Panetta, David Valadao, Salud Carbajal, and Chellie Pingree for their leadership in addressing this issue, and we look forward to working with you to advance this legislation as the 2023 Farm Bill moves forward.

Sincerely,

Organic Trade Association
Organic Farmers Association
National Organic Coalition
Organic Produce Association
Specialty Crop Farm Bill Alliance

CC: Chairman Glenn "GT" Thompson, Ranking Member David Scott
Chairwoman Debbie Stabenow, Ranking Member John Boozman