



March 6, 2017

Seth Murray, Senior Advisor
Office of the Chief Scientist
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Docket: 82 Fed. Reg. 8174

RE: Visioning of U.S. Agricultural Systems for Sustainable Production

To the Office of the Chief Scientist:

On behalf of the Organic Trade Association (OTA), I would like to thank the Office of the Chief Scientist for seeking comments on the long-term health and viability of U.S. Agriculture, and also providing an opportunity to offer suggestions for effective strategies to concurrently improve the economic, environmental, security, and health benefits to the U.S. through agriculture over the next 50 years.

OTA is the membership-based business association for organic agriculture and products in North America. The leading voice for the organic trade in the United States, OTA represents over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. Organic products represented include organic foods, ingredients and beverages, as well as organic fibers, personal care products, pet foods, nutritional supplements, household cleaners and flowers. Our member organic businesses work together to encourage and protect organic farming practices, and to share messages about the positive environmental and nutritional attributes of organic products with consumers, the media, and policymakers.

A vibrant organic industry is integral to agricultural systems for sustainable production in the United States, both now and in the future. We offer our support of and underscore the comments provided by The Organic Center (TOC), a non-profit organization with the mission of convening credible, evidence-based science on the environmental and health benefits of organic food and farming, and communicating the findings to the public. TOC is the leading voice in the area of scientific research about organic food and farming, and covers up-to-date studies on sustainable agriculture and health while collaborating with academic and governmental institutions to fill knowledge gaps. In their comment submission, TOC provided specific input on how organic is an integral part of the solution for agricultural sustainability by supporting soil health, mitigating climate change, upholding pollinator health, and contributing to a successful economy.

The almost 50 billion dollar-a-year organic industry is a bright spot in the U.S. farm economy. U.S. organic sales have grown exponentially from \$14 billion in 2005 to \$43.3 billion in 2015, a 209% increase. Organic has posted double-digit growth in each of the last five-years, including 11% growth in 2015.¹

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 2015.² More than 65 percent of organic farms sell in wholesale markets, creating a

¹ The Organic Trade Association's 2016 *Organic Industry Survey*

² The Organic Trade Association's 2016 *Organic Industry Survey*

distinct value chain in the greater food economy. From processors to packers, distributors to marketing cooperatives, the organic industry is employing Americans across the entire supply chain.

Organic hotspots—counties with high levels of organic agricultural activity whose neighboring counties also have high organic activity—kick start rural economies, boost median household incomes by an average of \$2,000 and reduce poverty levels by an average of 1.3 percentage points.³ To date, 225 counties across the United States are identified as organic hotspots and are as diversified as the organic industry, representing the various kinds of organic agricultural activity and accompanying businesses: crop production, livestock production, and organic processors.

The almost \$50 billion-per-year industry is supported by more than 24,000 certified organic operations nationwide. From strawberries to beef, wheat to eggs, organic farms and businesses can be found in all 50 states. When viewed as a commodity class, organic is the fourth largest food and feed economy in the U.S. with over 6.2 billion in 2015 farm-gate sales, up 13% since 2014.⁴ Still demand regularly outpaces supply, making organic an opportunity for U.S. farmers. Additionally, organic farms are 35 percent more profitable than the average farm and have higher gross receipts. Premiums paid to organic farmers can range from 29 to 32 percent above non-organic prices. The difference in on-farm net-income in many cases is what makes staying on the farm possible. In today's economic uncertainty, organic is critical to an economically sustainable U.S. agriculture production system.

Thank you for your commitment to the long-term success of agriculture in the United States, and for the opportunity to provide input on the Visioning of U.S. Agricultural Systems for Sustainable Production.

Sincerely,



Laura Batcha
Executive Director/CEO
Organic Trade Association

³ *U.S. Organic Hotspots and their Benefit to Local Economies* by Penn State Agricultural Economist Dr. Edward Jaenicke

⁴ USDA, NASS 2015 Certified Organic Survey