



September 30, 2021

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP

Docket: AMS-NOP-21-0038

RE: Letter to Secretary Vilsack regarding USDA Climate Change Initiatives

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the National Organic Standards Board (NOSB) Compliance, Accreditation & Certification Subcommittee (CACS) Proposal - Letter to Secretary Vilsack regarding USDA Climate Change Initiatives.

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 over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA supports the adoption of the CACS Proposal - Letter to Secretary Vilsack regarding USDA Climate Change Initiatives. We wholeheartedly agree that organic agriculture must be a key part of the solution to tackle climate change, and stronger federal support is needed for organic to reach its full potential to fight against climate change.

OTA has been active in advocating for USDA and Congress to recognize and support organic agriculture as a growing opportunity to mitigate climate change while creating economic, environmental, and health benefits for all food system participants. OTA's board of directors recently adopted a set of guiding principles for policy solutions to fight climate change and formed a member-wide Climate Change Task Force of over 65 members representing fiber and textiles, grains, dairy, specialty crops, retailers, input suppliers, consumer packaged goods companies, and more. We have also hosted virtual fly-ins for OTA members to meet with Congress to advocate for organic as a climate solution, as well as submitted extensive written comments to USDA with specific recommendations for supporting organic.

To support the CACS's work in advancing the letter, we provided comments in August to the CAC's preliminary draft letter dated July 13, 2021. We provided the following links to several resources that OTA has prepared on the topic of organic and climate change. Our [comments](#) to USDA on Tackling the Climate Crisis at Home and Abroad include detailed policies to advance organic, encourage voluntary transition to organic and support the adoption of climate-smart agricultural practices. Further [comments](#) call for big and bold investments in organic and identify specific recommendations of areas to support supply chain resiliency of the organic sector that will drive climate benefits. Our [white paper](#) is a comprehensive resource about the benefits of organic in fighting climate change and identifies the 10 core principles for policymakers to consider in developing good climate policy.



List of resources (click to download)

- [OTA's Comments to USDA on Tackling the Climate Crisis at Home and Abroad \(2021\)](#)
- [OTA's Comments to USDA on Supply Chains for the Production of Agricultural Commodities and Food Products \(2021\)](#)
- [OTA's White Paper: Advancing Organic to Mitigate Climate Change \(2020\)](#)

Please also refer to comments submitted from The Organic Center for additional references emphasizing the benefits of organic as supported by scientific research.

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 furthering organic agriculture.

Respectfully submitted,

Johanna Mirenda
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association