ADVANCING ORGANIC AGRICULTURE AT USDA

PRIORITIES

- Ensure organic has a seat at the table in climate discussions
- Restore leadership within the OSEC-MRP mission area
- Reinstate the Organic Livestock and Poultry Practices rule
- Publish a final rule on the Origin of Livestock
- Publish an interim final rule that encompasses the backlog of standards
- Establish a new framework for standards development
- Restore the Organic and
 Sustainable Agriculture
 Policy Advisor role
- Embed organic within USDA research programs
- Integrate organic into federal nutrition and procurement programs
- Restore full funding for organic certification cost-share
- Reform Federal Milk Marketing
 Orders
- Improve crop insurance and USDA risk management tools



















ADVANCING ORGANIC AGRICULTURE AT USDA

Building Back Better

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products. OTA is the leading voice for the organic trade in the United States, representing over 9,500 organic businesses across 50 states. OTA's diverse membership includes growers of all scales and commodities. shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, retailers and others. OTA's mission is to promote and protect organic with a unifying voice. OTA is the only organization that represents the full breadth of the industry. The USDA Organic label was set up as a marketing and regulatory program that not only impacts farmers both small and large but also major food companies and businesses throughout the whole supply chain.



ORGANIC IS GOOD FOR THE U.S. ECONOMY

- The \$55 billion a year U.S. organic industry is comprised of over 27,000 certified farms and businesses. [1]
- U.S. organic food sales continue to grow at a rate more than double the growth rate of the overall U.S. food market, and now account for nearly 6% of all food sales. [2]
- Organic food is found in the kitchens of over 82% of U.S. households. [3]
- Organic hotspots kick-start rural
 economies—counties with high levels of
 organic agricultural activity whose
 neighboring counties also have a high
 level of organic activity—boost median
 household incomes by an average of
 \$2,000, and reduce poverty levels by an
 average of 1.3 percentage points. [4]

ADVANCING SUSTAINABLE AGRICULTURE AND INVESTING IN THE NEXT GENERATION



The Biden-Harris plan to fight climate change recognizes that farmers are on the frontlines of a changing climate and must be a central part of the solution by building healthy resilient soils that sequester more carbon. The Biden-Harris plan calls for increased investments in federal agricultural research that serves the public not just private companies, a dramatic expansion of conservation practices that help farmers improve soil health such as cover cropping, and establishment of a voluntary carbon market that rewards farmers for the carbon they sequester and reductions in greenhouse gas emissions.

The science says organic farms

- emit 18% less global warming potential than other farming systems [5]
- use around 50% less new reactive nitrogen, a potent greenhouse gas [6]
- have 30% more species and up to 50% more pollinators than conventional farms [7]

Organic soils already sequester 26% more carbon than soils from non-organic farms according to the National Soil Lab inventory [8]

Stronger federal support for organic can maximize its benefits as a climate mitigation tool

Organic production has always required practices that advance sustainability in agriculture like crop rotation, cover cropping, building soil health, increasing biodiversity, and reducing nutrient pollution. The prohibition of the most toxic agricultural chemicals in organic farming benefits the environment, and reduces farmworker exposure and improves occupational health.

ENSURE ORGANIC HAS A SEAT AT THE TABLE IN CLIMATE DISCUSSIONS particularly in the development of any certification-type programs that incentivize climate-friendly farm practices.

THE FUTURE SUCCESS OF ORGANIC WILL REQUIRE A NEW PARADIGM AT USDA

Organic has come a long way over the past two decades, blossoming into the mainstream from what used to be a niche market, however the federal regulatory apparatus has stifled innovation and continuous improvement within the industry. In the past 10 years, industry has advanced 20 consensus recommendations for improvements to the organic standards, yet USDA has not completed rulemaking on a single one of them. The voluntary, opt-in organic program is unique, and should be viewed in a way that is different than mandatory regulations.

Timespan for USDA-NOP Rulemaking*

Organic Standards

18 years and counting



ORIGIN OF LIVESTOCK

12 years and counting



AQUACULTURE

12 years and counting



PET FOOD

11 years and counting



ANIMAL WELFARE

11 years and counting



PERSONAL CARE

10 years and counting



GREENHOUSE PRODUCTION

5 years and counting



INERT PEST CONTROL INGREDIENTS

^{*}USDA must work with the organic sector to prioritize rulemakings for final action to clear the backlog of **20** National Organic Standards Board recommendations that have yet to be acted upon.

Within the first year of the Trump administration, USDA:

- withdrew a final rule on animal welfare standards for organic;
- terminated the organic research and promotion program application;
- refused to grant a hearing for the organic dairy industry's request on Federal Milk Marking Orders;
- · canceled the transitional organic certification program;
- and removed all proposed rules on organic standards developed by the Obama-Biden administration from the Unified Regulatory Agenda.

The reversal of decades of work on improving and updating the organic standards has led to declining consumer trust in the organic label and has caused economic hardship for U.S. organic farmers.

FIRST YEAR PRIORITIES AT USDA AMS NATIONAL ORGANIC PROGRAM

- RESTORE LEADERSHIP WITHIN THE OSEC-MRP MISSION AREA that has strong experience and deep-rooted connections to the organic food and farming sector.
- REINSTATE THE ORGANIC LIVESTOCK AND POULTRY
 PRACTICES RULE implementing clear animal welfare standards for organic egg and poultry producers.
- PUBLISH A FINAL RULE ON THE ORIGIN OF LIVESTOCK ensuring a level playing field for thousands of U.S. organic dairy farmers.
- PUBLISH AN INTERIM FINAL RULE that encompasses the backlog of stalled standards.
- that is responsive to stakeholders and allows for continuous improvement, innovation and advancement of the standards.

 Consensus recommendations to update the organic standards through the National Organic Standards Board that require rulemaking should be included in the Unified Regulatory Agenda in a timely fashion.

administration.

FIRST YEAR PRIORITIES FOR ADVANCING ORGANIC ACROSS ALL MISSION AREAS AT USDA

- RESTORE THE ORGANIC AND SUSTAINABLE AGRICULTURE POLICY ADVISOR ROLE.

 Organic lacks a voice at the highest levels of USDA. Under the Obama-Biden administration, organic had a voice beyond career staff via the establishment of a department-wide organic policy advisor housed within the Secretary's office, but this position was eliminated during the Trump
- EMBED ORGANIC WITHIN USDA RESEARCH PROGRAMS.
 Robust federal research in organic farming systems will give
 ALL farmers the tools they need to face challenges and
 adopt more sustainable practices in the face of a changing
 climate. USDA research programs currently lack the
 knowledge and expertise of organic researchers and experts.
 Increased staffing of organic experts as well as emphasizing
 organic research and funding opportunities outside NIFA's
 organic research program will advance climate-friendly
 organic systems approaches in USDA research mission areas.
- INTEGRATE ORGANIC INTO FEDERAL NUTRITION AND PROCUREMENT PROGRAMS.

Although organic has become more accessible and affordable than ever, federal feeding programs have not been inclusive of organic food. Eliminating the prohibition on organic within the WIC program as well as including organic in other federal procurement programs administered by the Food and Nutrition Service will not only create new markets for climate friendly agriculture but also provide more safe and healthy choices for parents and low-income individuals.



Protecting Family Farms

The Biden-Harris plan calls for standing up for family farms by investing in the next generation of agriculture and helping small-and medium-sized farms thrive.

Organic represents an emerging opportunity for farmers of all scales and sizes

- Younger farmers gravitate to organic
 —the average age of organic farmers
 is six years younger than that of the
 national average of all farmers. [9]
- Over 70% of organic farmers have gross sales of less than \$250,000. [10]
- The number of organic farms grew by 39%, while the total number of farms in the U.S. shrank by 3% between 2012 and 2017. During that same time period, organic farm income nearly doubled while the income of all U.S. farms remained stagnant. [11]

Organic businesses and farmers need adequate risk management tools

While recent advancements have been made to provide better risk management tools for organic such as organic price elections for crop insurance, the USDA farm safety net is still largely failing to support organic farmers and they continue to struggle to obtain equitable access to programs that serve conventional farmers. Small improvements to existing risk management programs at USDA will cost the government nothing and put more money into farmers' pockets when they need it.

FIRST YEAR PRIORITIES TO STRENGTHEN THE SAFETY NET FOR ORGANIC FARMERS

RESTORE FULL FUNDING FOR CERTIFICATION COST-SHARE. The National Organic Certification Cost Share program is important to small and mid-size farmers and to attracting new, young farmers to organic. Farms can receive up to \$750 each year (75% of the certification fee) to help defray the annual costs of organic certification. However, over the past few years USDA's Farm Service Agency has delayed getting payments out in a timely manner and reduced the cost-share rate to a maximum of 50% of certification fees. It is critical to ensure payments are

made earlier in the fiscal year to give farmers adequate time to





apply as well as allow 75% of fees to be reimbursed.



REFORM FEDERAL MILK MARKETING ORDERS.

The organic dairy industry is currently subject to a federal milk marketing order system that does not directly benefit organic dairy processors or farmers or help them manage risk. USDA should grant the organic dairy industry a hearing to consider their case.

12 IMPROVE CROP INSURANCE AND RISK MANAGEMENT TOOLS. Programmatic adjustments are needed to help serve organic producers including how actual production history is calculated for transitioning farms, contract price addendums, whole farm revenue protection and access to marketing assistance loans and storage facility loans.

FUTURE PRIORITIES

After the most urgent priorities are addressed by USDA in year one, in years two-four of the first term of the Biden-Harris administration other priorities are ripe for consideration. Expanding access to land and technical assistance for organic farmers, modernizing the organic label through updates that allow non-GMO and climate-smart agriculture to be added, exploring mechanisms to reward organic farmers for ecosystem services, and increasing market and infrastructure development are just a few of many opportunities.

Immediate wins for the first 100 days



- Restore leadership within the OSEC-MRP mission area
- Reinstate the Organic Livestock and Poultry Practices rule
- Publish a final rule on the Origin of Livestock
- Restore the Organic and Sustainable Agriculture Policy Advisor Role
- Restore full funding for organic certification cost-share



Organic is a bright spot in U.S. agriculture, offering opportunities for market growth, providing economic stability for farms of all sizes, spurring investments in rural communities, and building a more resilient, climate-friendly system of farming. However, the last four years of the previous administration have stifled growth and threatened the livelihoods of organic farmers and businesses through many aggressive actions taken by USDA to roll back progress. Under renewed leadership at a future USDA, there are opportunities to reinvest in the fastest-growing segment of U.S. agriculture by taking simple steps to reverse regulatory inaction and expand support for organic food and farmers in all mission areas.



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