The Organic Center

October 4, 2016

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-So., Ag Stop 0268
Washington, DC 20250-0268

**Docket: AMS-NOP-16-0049**

**RE: Materials Subcommittee - Research Priorities 2016**

Dear Ms. Arsenault:

Thank you very much for this opportunity to provide comments on the Materials Subcommittee proposal on Research Priorities for 2016.

The Organic Center is 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 them to the public. We are a leading voice in the area of scientific research about organic food and farming, and cover up-to-date studies on sustainable agriculture and health while collaborating with academic and governmental institutions to fill knowledge gaps.

The Organic Center thanks the Materials Subcommittee for its recommendation on Research Priorities. We appreciate the creation of the Research Priority Framework and the efforts made by each Subcommittee to bring forth its research priorities for 2016.

We have reviewed the list of topics included for the 2016 and we're particularly pleased to see the inclusion of "Alternatives to Antibiotics (Tetracycline and Streptomycin for Fire Blight", "Plant Disease Management" and "Celery Powder." The Organic Center is actively involved in conducting and communicating research on these issues and we expect the prioritization of these topics by NOSB may help us secure further funding.

**Alternatives to Antibiotics**

We directly addressed the research priority "Alternatives to Antibiotics (Tetracycline and Streptomycin) for Fire Blight" in our recently completed fire blight project, which was carried out in collaboration with researchers from the University of Washington. This projected provided critically needed information on how to prevent fire blight from decimating apple and pear orchards without the use of antibiotics. The published report includes lessons learned from a systems approach to controlling fire blight without antibiotics which have been successfully used by dozens of Pacific Northwest organic orchardists. These strategies, along with previously existing materials, have been made available for organic orchardists to refer to as they shift to

non-antibiotic control. The written report is publicly available and covers methods for controlling fire blight holistically as well as issues such as sanitation, vigor control, sequence and timing of control materials, spray coverage, and varietal susceptibility.

**Plant Disease Management**

Our research project to find organic solutions to control citrus greening disease is an ongoing project in collaboration with the University of Florida, the University of California, Davis, USDA-ARS, citrus growers, and other non-profits. The first phase of our research was recently completed looking at the efficacy of organic pesticides. One of the organic materials—Mycotrol—significantly suppressed psyllid populations. This means that organic growers have resources in their tool bag to combat this disease. We are now pursuing funding for a large scale multifactorial study that takes a systems based approach by assessing the efficacy of combinations of resistant rootstocks, thermotherapy, organic approved insecticides and natural predators and parasitoids in organic systems.

In the last year we have also begun research to develop Integrated Pest Management strategies for organic rice production in the Southern United States. This project is being conducted in collaboration with Texas A&M University's AgriLife Research & Extension Center, Texas A&M Department of Soil and Crop Sciences, USDA's ARS Dale Bumpers National Rice Research Center, University of Arkansas Rice Research and Extension Center, and University of Arkansas at Pine Bluff Department of Agriculture. Flooded rice production systems used by organic farmers result in increased pressure from the diseases, weeds, and insect pests not commonly-found in dryland cropping systems. This is especially problematic in the South because of the region's warm, humid environments and the long growing season. This project focuses on developing cover crop-based production systems in combination with cultivar choice and seed treatment to enhance disease, weed, insect pest, and nutrient management, allowing producers to grow organic rice more sustainably and profitably in the South.

**Celery Powder**

In collaboration with the Organic Trade Association's National List Innovation Working Group and the University of Wisconsin, Madison we are investigating potential for the development of organically grown celery or other vegetables used in the curing of organic meat products. This OREI-funded research will help identify potential varieties of organic crops that would meet the chemical specification needed for curing, while being easily incorporated into current crop rotation systems. It will also identify potential management protocols to achieve target nitrate levels in the curing crop to produce the required shelf life and prevent bacteria in the cured meat, and to produce the desired flavor, color and texture in food.

The Organic Center is continually collecting information on research needs from multiple sectors of the organic community. We conduct industry roundtables, work with the Organic Trade Association's Farmers Advisory Council, meet with professors on our Science Advisory board and hold one-on-one meetings with individual companies, farmers, professors, and consumers. We feel that the proposed NOSB Research Priorities for 2016 are in line with the needs of the

organic industry and appreciate the release of this report as an important resource to guide the Center's own research priorities and project development. Based on feedback we've received during our own outreach efforts we would also like to suggest that the areas of manure use and food safety be considered for inclusion in the Research Priorities for 2016.

**Manure Use and Food Safety**

Certified organic producers are prohibited from using synthetic fertilizers on their crops. Instead, they often utilize animal-based soil amendments including manure and compost to improve soil fertility and quality. Currently, in order to prevent microbial contamination of crops with pathogens, organic farmers wait for a prescribed time between application of the soil amendment and harvest for consumption. However, current regulations for soil amendment wait times are based on little scientific information that shows that waiting time intervals between the use of soil amendment and the harvest reduce the microbial risk to minimal levels. Most recently, this knowledge gap created conflict when the proposed Produce Safety Rule of the Food Safety Modernization Act (FSMA) initially included a 9-month wait time that conflicted with the NOP regulations. Organic farmers expressed concern regarding negative impacts on soil ecology, disruption of current cropping cycles, and profits. As a result, the 9-month interval was removed until more data is available. Had the regulation remained it would have created substantial hardship for organic farmers. This conflict underscores the need for the organic community to actively fill this knowledge gap in order to stay involved and relevant in future regulatory decisions.

The Organic Center began working to address this need through collaboration with researchers from U.C. Davis to assess current practices used by the organic industry related to manure and rotational grazing to identify potential food safety risks. We conducted needs assessments to gather information about the use of animal-based soil amendments in organic agriculture and evaluate and characterize the current practices and needs of organic producers. The results of this work informed the development of a recently funded OREI integrative research proposal to (1) conduct a risk analysis of on-farm practices associated with persistence of pathogens on organic farms using manure, (2) determine the relationship between soil health and pathogen survival in organically managed produce fields treated with animal manure and (3) develop a comprehensive outreach program to provide technical and systems-based produce safety training.

**Organic Representation on USDA Research Boards**

Finally, The Organic Center recently held its inaugural Organic Confluences Conference: A Summit to Turn Environmental Evidence into Policy Practice. This summit brought together scientists, policymakers, farmers and industry to connect research on the environmental benefits of organic farming practices with policy to improve the sustainability of U.S agriculture. During the numerous break-out and roundtable discussions the need to increase organic representation in agricultural advisory panels that impact policy decisions ranging from agricultural support programs to research prioritization was voiced repeatedly. By guaranteeing adequate organic representation on USDA research boards and committees we can ensure that the organic sector's

interests and research needs are adequately and fairly represented. As such, The Organic Center is requesting that NOSB draft a letter to USDA requesting mandatory organic representation on USDA research boards and committees. The organic sector must ensure that all USDA appointed research boards include at least one member representing the interests of organic. The Organic Center believes the "Departmental Guidance on Organic Agriculture" released in May 2013 provides the perfect avenue for NOSB to submit such a request to USDA. See Appendix A.

Under the actions listed to implement guidance instructing Agencies, their Under Secretaries, and Administrators to recognize the distinct nature of USDA-certified organic production and organic goods, the following action is listed:

> Where the organic sector has specific research needs regarding production or regulatory compliance, the Department will endeavor to respond to those specific needs. The Department should include organic production as a component of its studies comparing the effects of different production systems when appropriate (e.g., investigation of climate change adaptation practices). Organic production models may provide alternative solutions to current agricultural challenges, and it is the Agency's responsibility to develop diversity in research and alternatives for all producers. The Organic Center encourages NOSB to take this opportunity to request that organic representation be a requirement of any USDA board or committee.

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Please do not hesitate to contact us for information on the data that we have been collecting or with questions you would like us to pose the research community.

Again, on behalf of The Organic Center, I would like to extend my thanks to the Materials Subcommittee for your commitment to furthering organic agriculture.

Respectfully submitted,

Jessica Shade
Director of Science Programs
The Organic Center

Appendix A

United States Department of Agriculture

Office of the Secretary
Washington, D.C. 20250

# USDA DEPARTMENTAL GUIDANCE ON ORGANIC AGRICULTURE, MARKETING AND INDUSTRY
**May 2013**

## I. Purpose

To provide the U.S. Department of Agriculture (USDA) agencies with Departmental guidance regarding the following:

A. The application of their programs and policies to producers and handlers of organic agricultural products produced in accordance with the USDA's National Organic Program (NOP);

B. Responsibilities for reporting and representation with respect to Departmental goals for organic agriculture;

C. Cross-recognition of certification regarding agency requirements that overlap with provisions of the NOP.

## II. Background

USDA is responsible, under the Organic Foods Production Act of 1990 (OFPA)(7 U.S.C. 6501-6522), for establishing national standards for organic production and marketing, for assuring consumers that organically produced products meet those standards, and for facilitating commerce in organically produced products. In addition to the unique regulatory system designed by OFPA, Congress has provided for distinct treatment of organic agriculture through the establishment of dedicated programs and policies for the following: research and education; data collection; risk management analysis; and conservation activities. Certified organic goods are also the specific subject of several international trade agreements.

Through the NOP, USDA has helped farmers and businesses create an industry that today encompasses over 17,000 organic businesses in the United States, and has grown to $35 billion in U.S. retail sales over 22 years, at an average growth rate of 16 percent. When viewed as a distinct category, organic ranks fourth in U.S. food/feed crop production at farm-gate values[1].

[1]Crop Values 2007 Summary Agricultural Statistics Board February 2008, NASS, USDA 2007 Census of Agriculture; 2008 Organic Producers Survey, NASS, USDA – Certified and Exempt Data. [#1 Corn, $52 Billion; #2 Soybeans, $27.8 Billion; #3 Wheat, $13.7 Billion; **#4 Organic Production, $3.2 Billion;** #5 Almonds, $2.3 Billion.]

This stream of production and commerce is a bright spot in the American marketplace of innovation and entrepreneurship, and particularly can contribute to USDA's goals for rural economic development. In recognition of this potential, the 2010 USDA Strategic Plan called for an increase of 25 percent in certified U.S. organic businesses by 2015[2].
The scope and rigor of NOP certification needs to be well understood by all USDA programs and agencies. Certification under the National Organic Program includes verification of numerous practices and conditions that correlate with requirements or responsibilities of other USDA programs. For example, organic standards include requirements that are relevant to conservation programs, food safety, risk management, export certifications, etc. As a result of these overlapping requirements, there may be redundant paperwork and fee burdens that can be streamlined or eliminated through cross-agency recognition protocols.

USDA and the organic sector should continue to work together to identify possible improvements within the Department. In order to ensure that USDA provides the tools and services that meet the growing needs of the organic sector and to remove obstacles to continued growth of organic production, the guidance below is issued.

## III. Guidance

The Office of the Secretary instructs the Agencies, their Undersecretaries, and Administrators to recognize the distinct nature of USDA-certified organic production and organic goods, review their agencies' actions with respect to the Department's 2010 Strategic Plan - Performance Measure 1.3.1, and take into account the documentation and inspection already required for organic certification for purposes of implementing programs and policies.

The following actions should be taken now to implement this guidance:

A. Where compliance with an agriculture practice or process is required, and this requirement coincides with provisions of the NOP regulations (7 CFR part 205), all USDA agencies will determine whether a valid USDA-NOP certificate can suffice as third-party verification and proof of compliance;

B. Where programs require documentation of land or livestock management practices for participation in an agency program, agencies will determine whether the "Organic Systems Plan," verified through the USDA NOP's third-party verification, will satisfy such documentation requirement;

C. Administrators will review their agency's training goals with respect to the USDA Organic Literacy Initiative and the relevant AgLearn training modules, and ensure fulfillment of those goals;

D. Administrators should confirm their agency's Point of Contact for the USDA Organic Working Group, which is the Department's internal communications network concerning organic agriculture and markets;

[2] USDA 2010 Strategic Plan, Performance Measure 1.3.1, p. 10.

E. In conjunction with the USDA Organic Working Group, Administrators should evaluate and report their actions directed toward achieving the USDA Strategic Plan performance measure 1.3.1 for growth of the organic sector;

F. Where it is apparent that a lack of organic-specific data impacts decisions, agencies should collaborate on data collection and analysis through the USDA Organic Working Group;

G. Where the organic sector has specific research needs regarding production or regulatory compliance, the Department will endeavor to respond to those specific needs. The Department should include organic production as a component of its studies comparing the effects of different production systems when appropriate (e.g., investigation of climate change adaptation practices). Organic production models may provide alternative solutions to current agricultural challenges, and it is the Agency's responsibility to develop diversity in research and alternatives for all producers.

## IV. Terms of Reference

A. Organic Literacy Initiative (OLI). The OLI is a package of training and outreach materials for use by all USDA employees and the public to do the following: 1) learn about the USDA National Organic Program and the role of USDA in organic agriculture; and 2) provide USDA staff with resources they may need to serve organic customers. (See www.ams.usda.gov/organicinfo for more information.)

B. Organic 101 and 201 AgLearn Training Modules. The goal of these trainings is to help USDA employees better understand the needs of alternative agricultural producers. This understanding will allow employees to make USDA programs and services more accessible and to enable them to connect with appropriate resources. AgLearn offers two training modules on organic agriculture: Organic 101: Introduction to Organic and Organic 201: Intermediate Organic.

C. The USDA Organic Working Group (OWG). The OWG is an internal communications and collaboration network with representatives from across USDA. The chair of the OWG is Mark Lipson, Organic and Sustainable Agriculture Policy Advisor, OSEC-MRP.

## V. USDA Organic Working Group - Points of Contact

(Current as of 8/1/2012)

| Agency | Point of Contact | Email | Phone Number |
|---|---|---|---|
| AMS – National Organic Program | Miles McEvoy | Miles.McEvoy@ams.usda.gov | (202) 720-3252 |
| AMS – Market News | Terry Long (Fruit & Vegetable)<br>Barbara Meredith (Cotton)<br>Joe Gaynor (Dairy)<br>Michael Lynch (Livestock & Grain)<br>Michael Sheats (Poultry) | Terry.Long@ams.usda.gov<br>Barbara.Meredith@ams.usda.gov<br>Joseph.Gaynor@ams.usda.gov<br>Michael.Lynch@ams.usda.gov<br>Michael.Sheats@ams.usda.gov | (202) 720-2175<br>(901) 384-3016<br>(202) 720-2175<br>(202) 720-6231<br>(202) 720-6911 |
| AMS – FSMIP | Janise Zygmont | Janise.Zygmont@ams.usda.gov | (202) 720-5024 |
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| AMS – FMPP | Carmen Humphrey | Carmen.Humphrey@ams.usda.gov | (202) 720-0933 |
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| ARS | Matt C. Smith | Matt.Smith@ars.usda.gov | (301) 504-4613 |
| CNPP | Elaine McLaughlin | Elaine.McLaughlin@cnpp.usda.gov | (703) 305-2950 |
| ERS | Catherine Greene | cgreene@ers.usda.gov | (202) 694-5541 |
| FAS – Trade Access | Kelly Strzelecki | Kelly.Strzelecki@fas.usda.gov | (202) 690-0522 |
| FAS – International Production & Trade Analysis | Andrew Sowell | Andrew.Sowell@fas.usda.gov | (202) 720-0262 |
| FAS – International Marketing Programs | Heather Velthuis | Heather.Velthuis@fas.usda.gov | (202) 720-9792 |

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| FNS – Nutrition Programs | Heather Hopwood | Heather.Hopwood@fns.usda.gov | (703) 305-2487 |
| FNS – Farm to School | Deborah Kane | Deborah.Kane@fns.usda.gov | (503) 326-2010 |
| FNS – Food Safety | Julie Skolmowski | Julie.Skolmowski@fns.usda.gov | (703) 305-1093 |
| FS | Andy Mason | AMason@fs.fed.us | (202) 205-1694 |
| FSA | William Chambers | William.Chambers@wdc.fsa.gov | (202) 720-3134<br>Main line:<br>(202) 720-7163 |
| FSIS | Small Plant Help Desk | InfoSource@fsis.usda.gov | 1 (877) FSIS-HELP<br>M-F 8 a.m.- 4 p.m. (EST) |
| GIPSA | Jennifer Hill | Jennifer.S.Hill@gipsa.usda.gov | (202) 720-0226 |
| NASS | Chris Messer | Chris.Messer@nass.usda.gov | (202) 690-8747 |
| ARS-NAL (National Agricultural Library) | Bill Thomas | william.thomas@ars.usda.gov | (301) 504-5724 |
| NIFA | Steven I. Smith | sismith@nifa.usda.gov | (202) 401-6134 |
| NRCS | Sarah Brown | sarah.brown@por.usda.gov | (503) 273-2433 |
| NRCS | David Lamm | david.lamm@gnb.usda.gov | (336) 370-3339 |
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| Office of the Chief Scientist | Jill Auburn<br>Colleen Rossier | Jill.Auburn@osec.usda.gov<br>Colleen.Rossier@osec.usda.gov | |
| RD – Business and Cooperative Service | Andy Jermolowicz | Andrew.Jermolowicz@wdc.usda.gov | (202) 690-0361 |
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| Agency | Point of Contact | Email | Phone Number |
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