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September 29, 2021

Ms. Michelle Arsenault, Special Assistant
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.,
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

**RE: Docket Number AMS-NOP-21-0038
Compliance, Accreditation, and Certification Subcommittee (CACs) Proposal: Letter to Secretary Vilsack regarding USDA Climate Change Initiatives
Materials Subcommittee Proposal: 2021 Research Priorities**

Dear Ms. Arsenault,

Thank you for the opportunity to provide comments on the National Organic Standards Board's (NOSB) letter to Secretary Vilsack regarding Climate Change Initiatives and the 2021 Research Priorities. We view these two topics as closely linked because the urgency of the climate crisis must inform research priorities that address challenges and unlock opportunities for adaptation and mitigation.

Letter to Secretary Vilsack regarding USDA Climate Change Initiatives

Farmers and ranchers across the country are facing the impacts of climate change on a daily basis. Extreme heat, persistent drought, widespread fires, and other impacts of a changing climate threaten agricultural production everywhere. Oregon Tilth strongly believes that organic production is a part of the climate change solution and is therefore very supportive of the NOSB letter to Secretary Vilsack.

The USDA National Organic Program is a robust effort to recognize and support agricultural systems that are proven to enhance soil health, mitigate climate change and improve on-farm resiliency. Organic is a success story that USDA should further support as the Department considers opportunities for agriculture to adapt to and mitigate the impacts of climate change.

Increased research for organic

Organic agriculture suffers from a lack of investment over many years that contributes to lower yields and other challenges. Organic production systems need funding for more research including cultivars and varieties developed specifically to work under organic and climate-friendly management and weed management

techniques that do not rely on synthetic inputs. Existing grant programs that support organic research are inadequately funded. As an indicator, the Organic Agriculture Research and Education Initiative (OREI) from the USDA National Institute of Food and Agriculture is only able to fund a quarter of the grant requests it receives. While organic products represent about six percent of all U.S. food sales, organic management systems only receive about one percent of USDA agricultural research funding. Increased organic research funding will close this gap and help farmers address production challenges to expand acreage and increase yields of organic crops and livestock products.

Education and technical assistance

Organic producers and, importantly, those who are exploring a transition to organic, lack the resources available to conventional farmers and ranchers. Funding is needed to increase the number of ag professionals, such as university extension agents, with expertise in organic management systems, emerging science and best practices. Additional funding is also needed to support other organizations that have already cultivated trusted relationships with organic producers and provide them with technical assistance. Oregon Tilth has long recognized the importance of technical assistance that bridges the gap between problems and solutions. For over a decade, we have worked closely with Oregon State University to create and bolster their organic extension program and provide training on organic systems to staff of the USDA Natural Resources Conservation Service to leverage the resources of these public institutions.

Conservation support

USDA should strengthen support for proven conservation programs like the Environmental Quality Incentives Program (EQIP) and Conservation Stewardship Program (CSP) offered through the USDA Natural Resources Conservation Program. These programs should add more support for organic practices that result in increased resiliency such as cover crops, crop rotations, and rotational grazing.

2021 Research Priorities

As stated above, Oregon Tilth believes that research supporting organic production systems is vitally important and applauds NOSB for developing priorities to inform research focus areas. While there is a broad need for research relevant to organic, priorities relevant to the climate crisis and climate adaptation are crucial. Several of the priorities currently listed fall into this category, for example:

- *Crops #12 Climate Change (Reducing Greenhouse Emissions and Sequestering Carbon).* Additional research demonstrating how organic production reduces greenhouse gas emissions and is more resilient to climate change can inform policy decisions and result in additional support for organic systems.
- *Crops #3 Organic No-Till and Minimum Tillage.* Reducing or eliminating tillage can enhance building soil organic matter and conserve precious water resources. For more widespread adoption of these practices by organic farmers, researchers must explore how to adapt these systems to a range of crops and climates.
- *Crops #4 Managing Cover Crops for On-Farm Fertility.* Cover crops can play many important roles including protecting soil, increasing water holding capacity, suppressing weeds (which can also benefit soil health by reducing the need for soil disturbance), building organic matter and adding nutrients. Organic producers need more information on the species and varieties that can work in their rotations as well as information on planting dates and termination methods.
- *General #2 Barriers to Transition to Organic Production.* To support the implementation of more climate-friendly organic farming practices, more research is needed to understand and overcome the

barriers to more producers transitioning to organic farming. Oregon Tilth has been exploring this issue for years, including through a national survey of over 600 producers who self-identified as transitioning to organic. The survey findings are available in our report, [Breaking New Ground: Farmer Perspectives on Organic Transition](#) which includes recommendations such as increasing technical assistance and developing more effective weed management strategies.

In response to the questions concerning other research topics to add to the NOSB priority list, consider the lens of climate change to inform those decisions. The suggested topic of “research into the effects of organic crop production on water” is an important area of focus given the increasing frequency of drought. When viewed as a soil health principle, the “benefits and risks of livestock integration into crop rotations” is another important topic to consider.

Thank you again for the opportunity to provide comments.

Respectfully Submitted,

Oregon Tilth

Oregon Tilth is a leading certifier, educator and advocate for organic agriculture and products since 1974. Our mission to make our food system and agriculture biologically sound and socially equitable requires us to find practical ways to tackle big challenges. We advance this mission to balance the needs of people and the planet through focus on core areas of certification, conservation, policy and the marketplace.