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

RE: Docket: AMS-NOP-22-0071, comments in response to

- Compliance, Accreditation & Certification Subcommittee (CACCS)
- Handling Subcommittee (HS)

Dear Ms. Arsenault:

Oregon Tilth thanks you for the opportunity to provide comments to the NOSB. We appreciate the work of the NOSB and its subcommittees and are grateful to have an opportunity to provide feedback. As always, Oregon Tilth supports the NOSB's work to improve and refine the organic system and its processes. We believe that collaborative actions that support and promote continuous improvement will result in a more robust, consistent, and beneficial system.

Compliance, Accreditation, and Certification Subcommittee

Proposal: Organic and Climate-Smart Agriculture - Organic IS climate smart

Oregon Tilth applauds the NOSB members for their time and efforts to thoroughly articulate why organic agriculture is Climate-Smart. Organic practices are proven to enhance soil health, mitigate climate change and improve on-farm resilience. Oregon Tilth agrees with the NOSB and believes that organic producers and practices should be explicitly recognized and robustly supported as a part of climate adaptation and mitigation initiatives. Certified organic producers should be automatically considered climate-smart and eligible for any funding and other support provided by USDA. Furthermore, the USDA should streamline reporting and paperwork so organic producers can easily access FSA, NRCS, RMA and other USDA programs. We look forward to the continued dialogue between the organic community, NOSB, and USDA.



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Discussion Document: Organic and Climate-Smart Agriculture - Climate Induced Farming Risk and Crop Insurance

Farming is an inherently risky business endeavor, with a variety of factors influencing success or failure beyond the farmer's immediate control. Farmers face diverse challenges such as pest management, increasingly extreme and erratic weather, and shifts in market demands and prices, all of which can contribute to sizeable shifts in farm income from one year to the next. Many organic farmers view their sustainable practices and crop diversification as strategies to mitigate risk and improve resilience. In some cases, crop insurance can offer additional security and a financial safety net against potentially devastating losses.

Oregon Tilth supports the NOSB's work to improve crop insurance for organic producers. As described in the NOSB's Discussion Document, there is a clear need to improve the existing policy tools offered to help farmers manage their risk. We are glad to see the NOSB's Discussion Document refer several times to NCAT's publication *Is Organic Farming Risky? Improving Crop Insurance for Organic Farmers* (Morris et al., 2019). Oregon Tilth's Executive Director served on the Project Advisory Committee for the USDA OREI grant project that culminated with this important publication. The project represents a comprehensive exploration of the intersection of federal crop insurance and organic agriculture. Most of the report's findings and recommendations are still applicable today. This valuable resource contains a wealth of insights into this timely, important topic. Informed by CACS's questions, we provide additional comments and perspectives below. We look forward to hearing the perspectives of producers and other organic stakeholders.

Trusted and timely data is needed to support the development of insurance products and risk management solutions that reflect the unique needs and market conditions of organic farmers. Good data informs actuarially sound numbers, which should be the foundation upon which USDA insurance programs are built. To this end, organic market data collection must keep up with the organic sector's growth. This can be accomplished by increased investment in the Organic Data Initiative as well as ensuring USDA collects comprehensive organic market and farm data by incorporating collection of organic data into routine USDA surveys and then segmenting organic data in published reports.

As an organic certifier we do not directly engage with crop insurance and rely on the experiences of the producers we certify to learn more about this topic. Oregon Tilth received feedback on crop insurance and other USDA programs via a survey last year. With only 24 responses, the results are representative of a relatively small subset of organic producers. Producers who responded to the survey were in the Pacific Northwest and the majority produced vegetables and fruit followed by a smaller number who grow grains, pasture and hay.



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Many of our survey respondents (82%) do not use crop insurance. The main reasons stated for not using crop insurance were that it is not applicable to their scale (60%) and not applicable to the diversity of their cropping system (60%). Several producers (26%) stated that the lack of risk management tools was a main barrier to transition.

We have heard anecdotally that transitioning and certified organic producers face paperwork challenges when attempting to access crop insurance as well. As mentioned above in the climate-smart discussion, the USDA should streamline paperwork and other documentation so organic producers can easily access RMA and other USDA programs. A common OSP may be one tool to facilitate this improved access.

Discussion Document: Oversight improvements to deter fraud: Consistent Location Identification

Oregon Tilth supports CACS's efforts to work towards more consistent and accurate location and land eligibility verification data for all certified operations. Oregon Tilth also supports these efforts as they support effective Strengthening Organic Enforcement implementation through increased traceability across the supply chain and harmonization across operations and certifiers for enhanced cross-checks. Aligning our systems with the Risk Management Agency (RMA) can also prove beneficial for certifiers, the NOP, certified operations, and other governmental agencies, particularly when preparing for, analyzing, and responding to catastrophic events. We provide our comments and perspectives below, following NOSB's questions.

Are you currently collecting field-level location information? If so, what method are you using to collect this information?

Oregon Tilth requests specific addresses for each parcel an operation is requesting for organic certification. This information is outlined in an Organic System Plan module, C2: Crops Acreage and Land History, for each physically separate, non-adjacent parcel. The way we describe the information we are looking for to clients is a description of how they would direct emergency services or an inspector conducting an unannounced visit to locate the field. GPS coordinates is one option a client has in providing this information, which is then copied into our internal database, Intact Platform. There are instances where the inspector can provide more accurate parcel location information post inspection, in which case the OSP (C2 module) and parcel information in Ecert is updated. OTCO collects specific field location information in various ways depending on where the location is.

For example, Oregon Tilth collects geo codes for all parcels we certify in Mexico as this is a reporting requirement to SENASICA. We ask that inspectors verify and/or collect this



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information as part of the inspection. We have very specific procedures for inspectors on how to collect this latitude and longitude information depending on the type of parcel or operation. It is important to note that in Mexico we also collect the geo codes for facilities as well to report accurate locations for all parcels and facilities inspected and certified.

For operations that OTCO certifies outside of Mexico, we request addresses for each parcel an operation would like certified and is outlined in the OSP (C2 module.) This may be simply cross streets or other descriptors, such as “half mile west of the intersection of X St and Y St”, when actual mailing or physical addresses are not available or Section/Township/Range. The way we describe the information we are looking for to clients is a description of how they would direct emergency services or an inspector conducting an unannounced visit to locate the field. GPS coordinates is one option a client has in providing this information, which is then copied into Ecert. There are instances where the inspector can provide more accurate parcel location information post inspection, in which case the OSP (C2 module) and parcel information in Ecert is updated.

Guidance will be need to address challenges and to ensure accurate data and consistency across certifiers. One example of a challenge is collecting accurate geo code data: we would need direction on where to get codes for parcels/fields that are not square/rectangular. Other examples could include: How will the data be used? Would it be publicly available? If so, how would privacy concerns be addressed if this data was added to OID?

Which certifiers currently request GPS coordinate information to identify locations of organic fields?

OTCO requests Geo codes (latitude and longitude) as part of the OSP and parcel identification but we *do not require* that farmers identify and list this code on their OSP. For operations in Mexico, they are able to self-identify it but we have found that we *always* have to verify and update it at inspection.

Certifiers: Are you able to locate every field you certify via the information provided solely by your client (e.g., maps, field history, OSPs), or would you need the certified client to show you where the field is located?

Yes, Oregon Tilth can identify and locate every field certified solely by client information through OSP Crops Acreage and Land History modules and maps. Location data is then entered and managed in our internal database, Intact Platform. In some cases, it may take additional resources like Google or other mapping software, but we do push to make sure the OSP is complete and that we are able to identify the location without assistance. We also need to do so in order to be able to complete an unannounced inspection.



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What would be the best GIS or Geospatial Tool for certifiers and inspectors to view aggregated location data via maps?

There are many tools available and having a toolbox full of adequate tools always works best for our industry. Oregon Tilth strongly discourages from recommending or requiring only one tool. Instead, we request that the necessary needs of any tools be identified and allow operations and certifiers to determine the best tool for their use. It is also important to think about tools that are readily available and can easily be integrated into the inspectors' toolbox and work across many countries.

We look forward to the discussion on this topic and further engaging with this topic going forward.

Handling Subcommittee (HS)

Proposal: Ion exchange filtration - Resins

Oregon Tilth supports the HS's recommendation that recharge materials used in the ion exchange filtration process must be listed on the National List. We also agree with Option #1; Resins do not need to be listed. We fully support the request that the NOP issue instructions to certifiers that include requirements for verification as described in NOSB Proposals & Discussion Documents April 2023, page 147. We would appreciate a consistent approach among certifiers for reviewing ion exchange processes to better serve our clients and the organic industry.

The purpose of ion exchange is to filter out undesirable elements in the product. If the purpose of the ion exchange is to remove heavy metals or coloring from sugar, the final product will no longer be within the desirable range when the ion exchange system is no longer in "good working order". As soon as the heavy metals or coloring are outside of the desired specification range, it would trigger that the resin and/or recharge materials need to be replenished. This is essentially a tool for food safety and ensuring undesirable elements are removed. Since the Technical Report suggests that contamination from these materials is not a concern, requiring that each resin be individually reviewed and approved (option 3), the organic industry would be creating costly barriers to providing safe and quality food equivalent to non-organic versions.

Oregon Tilth's previous comments on Ion Exchange (April 2020) are available here: <https://tilth.org/education/resources/nosb-comments-spring-2020-ion-exchange/>



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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.