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September 28, 2023

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-23-0026, comments in response to Compliance, Accreditation & Certification Subcommittee (CACS) topics

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

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

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. This new discussion document is thorough and, based on our experience, accurately reflects the challenges organic farmers face regarding crop insurance.

We appreciate the inclusion of data as one important challenge and the nuanced discussion on this topic. We also appreciate the discussion regarding the critical role that insurance agents play. Agents must understand organic systems, the different insurance options available, and how to offer the optimal coverage for their farm clients. Additionally, the paperwork and effort required must be commensurate with the risk management value provided, for both the agent and the farmer. Increased organic literacy within the RMA as well as insurance agents is a prerequisite to crop insurance serving the unique needs of the organic sector.



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One paperwork challenge not explicitly identified in the discussion document involves a review of an organic system plan as part of the crop insurance eligibility process. We have heard anecdotally that transitioning and certified organic producers face challenges when attempting to access crop insurance because service providers require verification of their organic system plan or transitional status. As has been previously discussed, the USDA should streamline paperwork and other documentation so organic and transitioning producers can easily access crop insurance and other USDA programs. The NOP letter to organic certifiers on June 28th entitled “Organic Integrity Database – Transitional Operation Reporting” offers steps to address this topic.

Discussion Document: Opportunities in Organic -Improving Support for Organic Transition

Have you been involved in the USDA Organic Transition Initiative? Describe your experience to date. What is working well? What could be improved? What barriers to organic transition need more attention?

Oregon Tilth is proud to serve as the Northwest regional lead for the new Transition to Organic Partnership Program (TOPP), one portion of the broader USDA Organic Transition Initiative. In this role we are working with many partners across Alaska, Washington, Oregon, Idaho, Montana and Wyoming to deliver a variety of support services for transitioning producers. NW TOPP partners will provide a farmer-to-farmer mentorship program, technical assistance on organic certification, agronomy and other topics, community building activities, and workforce development. Field days are underway, workshop sessions are being planned for winter conferences and the mentorship program has begun matching experienced organic growers with those interested in transitioning to organic. While we are busy planning and delivering programs, TOPP is still quite new, and programs are still being developed. We have received positive feedback from producers about the programs but will learn much more about opportunities for improvements in the coming year and beyond. We believe these are the right kinds of support, they need to be sustained and expanded.

In discussions with producers and partner organizations across the Northwest it has become clear that more organic market opportunities are needed. The new Organic Market Development Grants program will address some supply chain issues and support market development to some extent, but additional investment over a longer period is needed. In the Northwest region there are producers who would grow more certified organic crops if there was a clear market opportunity. Several buyers of organic products in the region have reported a saturation of the organic produce market in specific crop categories, for example. More



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market data is needed to clearly identify crop categories where demand still exceeds supply or where market expansion opportunities exist. With such insights, pinpointed market development efforts can fill supply gaps and respond to opportunities for growth.

Oregon Tilth is also excited about the USDA Natural Resources Conservation Service (NRCS) Organic Transition Initiative (OTI) and the new Organic Management Standard (823). We are thankful for NRCS's commitment to expanding support for organic and transitioning producers and looking forward to partnering with NRCS as the OTI continues to roll out. The NRCS OTI pairs well with TOPP as it delivers direct cost-share payments to producers and helps them to conserve natural resources as they transition their operation to organic. Similar to TOPP, the NRCS OTI is new. NRCS is still at the beginning of the first cycle of 823 contracts and we will learn much more in the coming year. Oregon Tilth has a long history of partnership with NRCS, and we look forward to continuing that work, providing training to NRCS staff on 823 and other organic topics in addition to outreach to organic producers and certifiers about NRCS support.

Have you recently transitioned to organic, or do you help operations transition to organic? What are the most significant remaining barriers to organic transition? What works well to reduce those barriers? What have you tried that didn't work?

Oregon Tilth is committed to making the transition accessible for all farmers interested in becoming certified organic. We work directly with producers to help them understand the regulations and recordkeeping required for certification. This includes one-on-one conversations with those interested in certification, presentations at farmer workshops and conferences, and the development of resources.

To understand the motivations and challenges associated with transition, we partnered with Oregon State University (OSU) to survey hundreds of farmers across the country. *Breaking New Ground: Farmer Perspectives on Organic Transition* (<https://tilth.org/education/resources/breakingground/>) highlights the barriers to transition—weed management and the cost of certification rank highest—and includes recommendations for support to transitioning farmers—mentoring from experienced growers and providing one-on-one technical assistance rank the highest.

Oregon Tilth is proud of our partnership with Oregon State University where we were instrumental in building the nation's first dedicated organic extension program. This organic focused extension work provides one-on-one technical assistance to producers on topics like weed and nutrient management. This organic expertise is critical to organic and transitioning producers and the OSU Oregon Extension program continues to grow to meet needs. The Organic Vegetable Specialist, Organic Pasture and Forage Specialist, and Organic Grains and



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Pulses Specialist will soon be joined by several more organic extension specialists with new funding from the Oregon legislature.

While TOPP is delivering technical assistance and a mentorship program as requested by producers, the high cost of certification remains a significant barrier. Based on survey findings and anecdotal evidence, the cost barrier is greater for producers in transition and those who were unsuccessful in transitioning (as compared to currently certified growers). As an organic certifier, we know that the initial years are particularly challenging, and can often extend beyond the 3-year transition period. Those who are unable to overcome the barriers do not remain certified. For long-term success, it is critical to address major obstacles during this precarious time, defined by refining organic management system practices and securing reliable organic market opportunities.

The cost of certification is increasing as USDA Organic Regulations are strengthening. New rules to deter fraud add oversight to the complex organic supply chain, increase recordkeeping requirements, and create more robust enforcement mechanisms. These necessary changes result in additional time and effort to certify organic operations which unfortunately results in increased costs.

Unfortunately, many Historically Underserved producers find the cost of certification to be a large barrier to transition. For example, one survey found that twice as many BIPOC producers rated the cost of organic certification as a substantial challenge as compared to white organic farmers (see [Organic Farming Research Foundation's 2022 National Organic Research Agenda](#)).

To help address the cost barrier, the Organic Certification Cost Share Program must be improved. Funding should be increased, and program administration must be streamlined. Please see more of our recommendations in this report: https://issuu.com/tilth/docs/oregon_tilth_cost_share_white_paper_2022.

How do support organizations find farms or ranches interested in transitioning? How do organizations advance racial equity in outreach?

We use partnerships to conduct general outreach about organic and to advance racial equity in outreach. We try to include organic in existing networks, programming or events. For example, to expand our work focused on supporting the economic viability of organic farms, we created new partnerships with 1890 Land Grant institutions such as Tuskegee University and Mississippi Small Farm and Agribusiness Center at Alcorn State University and other organizations in the Southeast. Those partnerships allow us to deliver farm viability programming to the audiences



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those institutions serve. To advance racial equity, the organic community can't wait for diversity to come to us; we must go to where diversity already exists.

How do transitioning producers plan for the first few years after achieving certification? How does support for organic transition also support retention?

While the focus on transition is obviously key to the growth of the organic sector, we must also support existing and newly certified organic producers to ensure they are successful and remain certified. One-on-one technical assistance on organic recordkeeping or organic weed management, for example, should not stop once a producer is certified organic. As mentioned above, the organic market must be developed so both existing and newly certified producers experience the value of organic certification.

What could be done to foster a more diverse, equitable, and inclusive organic sector?

The organic community must focus on DEI in terms of the organic workforce and certified organic producers. We believe partnerships are a key tool and Oregon Tilth is creating new partnerships to diversify the organic workforce. For example, we are partnering with HBCU Paul Quinn College in 2024 to offer two paid internship opportunities at Oregon Tilth so students can be exposed to careers across a variety of departments and teams across the organization. As described above, we are building partnerships to expand outreach about organic and transition to Historically Underserved communities. Working with organizations and institutions that understand the unique barriers and strengths of these communities and have cultivated trust with those they serve is a community-led approach that creates relevant, meaningful opportunities. Oregon Tilth looks forward to continuing to engage in this important conversation with the organic sector.

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.