



503.378.0690
PO Box 368
Corvallis, OR 97339
organic@tilth.org
tilth.org

April 3, 2024

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-23-0075

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.

Materials Subcommittee

2024 Research Priorities Discussion Document

Oregon Tilth supports the NOSB's ongoing work on setting research priorities for the organic community. Oregon Tilth recognizes the importance of research and extension for organic and transitioning-to-organic producers. We have collaborated with Oregon State University for many years, helping to create an Organic Extension Program. In the last year, Oregon Tilth worked with other organic stakeholders to successfully advocate for the creation of four new organic extension positions to expand the Organic Extension Program to a total of six positions across the state. As a part of this process, the organic community in Oregon came together to set research and extension priorities which may be informative to the NOSB in crafting national research priorities.

Of the two existing organic extension specialists, one focuses on vegetable and the other on pasture and forage management. The four new specialists will focus on soil management, grains and pulses, tree fruit and nuts, and seeds and planting stock.



503.378.0690
PO Box 368
Corvallis, OR 97339
organic@tilth.org
tilth.org

In setting priorities, the Oregon organic community emphasized priorities identified by the NOSB as “ongoing” topics including:

- opportunities for climate change mitigation and resilience, including reducing greenhouse gas emissions and sequestering carbon,
- management of problem insects, diseases, and weeds,
- organic nursery stock production,
- effective forage management for dairy producers, and
- managing cover crops for on-farm fertility.

The organic community in Oregon has also emphasized some priorities that are not explicitly identified by the NOSB list including:

- general nutrient management and soil fertility,
- species and cultivar development, and
- seed quality and availability.

Discussion Document: Organic Food System Capacity and Constraints Discussion Document

Questions to Stakeholders:

1. Are we retaining our existing organic acres and producers or are we experiencing overall loss of current organic producers?

Oregon Tilth has observed a gradual decline in the total number of crop and livestock producers. In the last six months, the total number of clients certified under the crop scope has decreased by 3% and the total number under the livestock scope has decreased by 5%. In that same timeframe, we have certified several new crop and livestock producers, but the net has been a decrease.

Operations surrender their certification or are suspended for several reasons. The most common reason is the operation closing or being sold. Producers could be retiring or moving out of agriculture. The second, and nearly as common, reason is the operation moving away from organic certification due to a lack of market, financial considerations, or other reason. One grower, for example, stated their buyer would rather purchase conventional crops and despite the producer’s personal belief in organic, they can’t justify the financial cost of organic certification. Other reasons include operation issues such as crop failures and personal issues.



503.378.0690
PO Box 368
Corvallis, OR 97339
organic@tilth.org
tilth.org

2. Are existing organic producers expanding or contracting acres of organic production?

Unfortunately, we are not able to easily aggregate and report on historical trends related to acreage. To do so would require additional staffing resources and capacity.

3. What additional infrastructure is needed to make organic supply chains more lean and more efficient?

Consumer demand for organic products has steadily increased, driving growth in organic sales over many years. However, the growth of organic acres has been limited in the United States, with much of the demand fulfilled by imports from foreign suppliers. In general, a major constraint has been limited access to organic handling infrastructure that is both right-sized and within reasonable distance. As part of the USDA's Organic Transition Initiative, the Pinpointed Organic Market Development grant program offered an initial response to the organic sector's need for increased domestic infrastructure to meet consumer demand. Proposals submitted to the grant program significantly exceeded available funding, signaling the ongoing need to fully capitalize on domestic market opportunities for domestic producers and manufacturers. The organic sector needs to codify the Pinpointed Organic Market Development grant program beyond a one-time funding opportunity. An ongoing Organic Market Development program would leverage investments in new and expanded organic markets by supporting increased infrastructure, processing capacity, market development activities, targeted equipment purchases, and other activities to increase consumption of domestic organic commodities. Given the diversity of the organic sector's commodities and products, the specific additional infrastructure needs will vary in size, type, and location. Project proposals developed by specific market categories (specialty crops, dairy, grains, fiber, hemp, etc.) would reflect and address their unique infrastructure needs in a manner that increases both efficiency and accessibility.

4. What organic processing capability do we need to establish?

Please refer to our prior comments regarding organic infrastructure needs because processing capacity needs share many of the same considerations and proposed solutions. Across the United States, the organic industry needs additional regional processing capacity for specialty crops and livestock that is scale-appropriate for the size of the sector. In Oregon, for example, the growth of the organic hazelnut sector is limited by a lack of certified organic processing capacity. Last year, the sole certified organic hulling facility surrendered certification and producers scrambled to find another option in a neighboring state. Local certified organic slaughter and livestock processing facilities are also needed to offset existing options that often require extensive travel and cost to access.

Improving Support for Organic Transition Proposal



503.378.0690
PO Box 368
Corvallis, OR 97339
organic@tilth.org
tilth.org

Oregon Tilth thanks the NOSB for their work soliciting and aggregating feedback on the USDA Organic Transition Initiative. We are thankful for this historic investment from the USDA and, like the NOSB, are interested in any recommendation to ensure the success of these programs. We support the proposal and the focus areas. We agree that the various agencies at USDA that support organic producers should be better coordinated and work in closer collaboration. Oregon Tilth believes the Department should fill the role USDA Organic Policy Advisor to facilitate this cross agency work at this critical time and encourages NOSB to endorse the appointment of this position.

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.