



Education, resources, and expertise to help farmers grow organic.

Organic Promotion, Research and Information Order
Room 3071-S, STOP 0201
Agricultural Marketing Service, USDA
1400 Independence Avenue SW
Washington, D. C. 20250-0201
amsadministratoroffice@ams.usda.gov
July 20, 2015

Hello,

Please consider this partial proposal on the proposed new organic industry-funded promotion, research, and information order, which would be developed under the Commodity Promotion, Research and Information Act of 1996.

This proposal is submitted on behalf of the Midwest Organic and Sustainable Education Service (MOSES). As a 501(c)3 educational non-profit with a mission "MOSES educates, inspires, and empowers farmers to thrive in a sustainable, organic system of agriculture," we are committed to helping in whatever way we can to increase the number of organic farms, acres, farmers and products in our region of the upper Midwest and across the United States.

MOSES organizes the largest organic farming conference in North America, at the end of February in La Crosse WI each year, with over 3500 attendees in 2015. Our monthly enews is sent out to over 11,000 email addresses each month, and our year round educational activities include the organic info phone line, ask the specialist form on our website, field days, workshops, fact sheets and our Organic Broadcaster bi monthly newspaper. These interactions with organic producers of all types keeps us informed on the needs and desires of the organic community.

After reading the proposal submitted by the Organic Trade Association, we feel it is imperative that two items be modified to better represent the will of those who are National Organic Program certified organic operations.

We believe the definition of organic research must be modified to detail aspects of agricultural production not covered in the original proposal. While there are challenges in all aspects of production and marketing, the largest challenges are based in understanding natural systems and mimicking them to produce food and fiber on the farm without the use of NOP prohibited materials or practices. Consumers depend on organics to lead the way in this type of agricultural production, and sadly, we have many knowledge gaps in organic agricultural production. There is much innovation on organic farms, but the amount of peer reviewed research, so important in developing systems, seeds and livestock breeds that thrive in an organic system of agriculture, is not anywhere sufficient enough to provide the tools necessary to increase our domestic organic agricultural production.

Our proposed definition for §12XX.27 Research is as follows:

§12XX.27 Research.

Research means any type of investigation, study, evaluation, or analysis (including related education, extension, and outreach activities) designed to improve organic farm production systems and practices, increase farm profitability and productivity, expand organic farming opportunities, and enhance quality of life for farm families and their communities; enhance plant and animal breeding and varietal development for organic systems and improve the availability of other production inputs; optimize natural resource conservation, biodiversity, and environmental outcomes of organic agriculture; identify and explore solutions to economic, marketing, trade, and policy constraints on the expansion of organic agriculture; advance organic farm and food safety objectives; enhance or increase the consumption, image, desirability, use, marketability, or production of organic products; or to do studies on nutrition, market data, processing, environmental and human health benefits, quality of organic products, including research directed to organic product characteristics and product development, including new uses of existing organic products, new organic products or improved technology in the production, processing and packaging of organic products.

In addition, we request that the percentage of dollars allocated to all research and specifically for organic agricultural research be modified as illustrated in bold below.

§12XX.50 Budget and expenses.

(a) At least 60 calendar days prior to the beginning of each fiscal year, and as may be necessary thereafter, the Board shall prepare and submit to the Department a budget for the fiscal year covering its anticipated expenses and disbursements in administering this part. The budget for research, promotion or information may not be implemented prior to approval by the Secretary. Each such budget shall include:

(1) A statement of objectives and strategy for each program, plan or project;

(2) A summary of anticipated revenue, with comparative data for at least one preceding fiscal year, which shall not include the initial budget;

(3) A summary of proposed expenditures for each program, plan or project. This shall include the following allocation of expenditures:

(i) The funds shall be allocated as follows: 65 percent for research, 20 percent for information, 10 percent for promotion, and 5 percent for discretionary funds; and

(ii) Of the funds allocated to research, no less than half shall be allocated to producer-oriented research. This research should take into account regional differences and priorities for producer-oriented research. Funds should be allocated equitably to reflect regional producer research needs.

(iii) Any expenditures designated for the categories set forth in (i) and (ii) of this section that are not spent in a fiscal year shall carry over for the same category for the following fiscal year.

Second, the organic community is known for its passion and its participation in the development of the organic law and the subsequent regulations. This new organic research and promotional board must also be transparent in its dealings. There is no provision for this

transparency in the original proposal, and we strongly recommend that this wording, or other wording that accomplishes the same goal, be added to any proposal that would be voted upon by the organic stakeholders. Transparency is a way of protecting fairness and ensuring the common good. The stakeholders must be able to understand how decisions are made and have a chance to ensure that decisions treat everyone equally and to hold the board members representing their interests accountable. Inadequate public access to information allows corruption to flourish, and back-room deals to determine spending in the interests of the few rather than many. As proposed, there will be many organic certificate holders that would not be assessed, unless they choose to do so voluntarily. However, the work and dissemination of funds of this Board will affect their livelihoods and they must have access to the Board transcripts in order to understand the rationale behind the Board's actions.

Our recommendation is as follows:

§12XX.44 Procedures

(f) All meetings shall be publically noticed with the date, time and location no later than 60 days prior to the meeting on the National Organic Program website and/or the official website designated by the Board. Assessed participants in the program shall be allowed to attend these Board meetings and an allowance for their presence should be provided when choosing the location.

(g) Complete written transcripts of the Board's meetings shall be available to all organic certificate holders on the National Organic Program website and/or the official website designated by the Board.

Thank you for your serious consideration of these necessary improvements to the Organic Trade Association's original Organic Research and Promotion proposal.

Sincerely,

A handwritten signature in cursive script that reads "Harriet Behar".

Harriet Behar
MOSES Senior Organic Specialist