



# ORGANIC FARMING RESEARCH FOUNDATION

*Fostering the improvement and widespread adoption of organic farming.*

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Policy and Oversight Division  
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### **RE: Comments Responding to the 2017 FY 2017 Integrated Research, Education, and Extension Competitive Grants Program-Organic Transitions (ORG)**

On behalf of the Organic Farming Research Foundation (OFRF) we are submitting the following recommendations in response to the solicitation for stakeholder input on the FY 2017 Integrated Research, Education, and Extension Competitive Grants Program-Organic Transitions (ORG).

OFRF works to foster the improvement and adoption of organic farming systems by cultivating organic research, education, as well as engaging in federal policies.

Research, extension, and education policies and programs are key issues and have been a core component of OFRF's policy work for over twenty-five years.

The recommendations and suggestions are based on outreach and engagement with organic researchers from around the country, as well as the comprehensive evaluation of organic research needs in the 2016 National Organic Research Agenda.

Overall, we are very pleased with the FY 2017 ORG RFA, and we are happy to see that the USDA has placed such a keen emphasis on the environmental and ecosystem benefits of organic agriculture. We have a few recommendations for you as you draft the FY 2018 RFA.

We appreciate the opportunity to provide you with comments and recommendations, and would be happy to provide you with any additional input or clarification as needed. We welcome the opportunity to discuss these recommendations further.

Sincerely,

Michael Stein  
Policy Associate

Diana Jerkins  
Research Director



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## **RECOMENDATIONS FOR LEGISLATIVE AUTHORITY AND BACKGROUND (Pg. 5)**

### ***Strengthen the emphasis on addressing barriers to organic transition and providing practical information and tools that help farmers make a successful transition to organic production***

The Organic Transitions Program can play a distinct and vital role in USDA's portfolio of extramural competitive grants programs: assisting farmers in making a successful transition to USDA certified organic production. Farmers with experience in conventional systems face a steep learning curve in adopting organic practices, which require an entirely different approach to management of soil, crops, livestock, nutrients, weeds, pests, and diseases. Maintaining soil fertility and weed control can be especially challenging during the transition. In addition, fields and pastures with a conventional management history respond differently to organic practices, and may require that the new or transitioning organic producer implement different or more intensive care than would be needed for land with a long term organic management history. Producers making the transition urgently need practical, science-based information that help them overcome barriers and specifically addresses the unique challenges they face.

Farmers considering whether to make a transition to organic need more science based information on transitioning to organic production, as well as the benefits of organic practices to soil, crop, livestock, human and environmental health; long term farm sustainability and economic viability; and ecosystem services such as water quality, pollinators, wildlife, and climate.

New or transitioning organic producers also face a different array of marketing venues, challenges, and opportunities from conventional producers. For example, the potential for organic practices to ameliorate environmental and climate impacts can be an important factor in today's marketplace. ORG-funded research into ecosystem services has begun to elucidate the environmental impacts of organic practices and organic transition, and this work should be continued in order to develop practical guidelines for optimizing environmental outcomes of organic transition.

We believe that the ORG program offers a vital service that complements and does not duplicate the Organic Research and Extension Initiative (OREI, which focuses on production systems and management strategies for currently organic farms) and Sustainable Agriculture Research and Extension (SARE, which emphasizes sustainable practices but does not require USDA certified or transitioning land). Farmers undertaking or considering transition to organic have unique challenges, and the needs for practical information on tools to facilitate the transition. Needs that the ORG program is ideally positioned to address. We encourage NIFA to strengthen this emphasis in the Legislative Authority and Background as well as the Program Priorities sections of the RFA.

### ***Amend the emphasis on environmental services and climate change mitigation***

Research on the environmental impacts and ecosystem services of organic agriculture is an important and ongoing priority, specifically in the areas of soil health, soil and water conservation, pollinator health, and management of weeds, disease, insects, and fertility in organic systems, as well as adaptation and mitigation of climate change.



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***Retain the emphasis on the development of educational tools, as well as the integration of research, education, and extension activities***

Cooperative Extension personal and other agricultural professionals who advise producers on organic practices and transition strategies are important touchpoints for both organic and transitioning farmers. Development of education tools and other methods of outreach are vital in ensuring that information gets in the hands of the farmers who need it. Transitioning farmers face obstacles and barriers that require unique educational outreach, coupled with strong research and extension.

***Retain the emphasis on the development of cultural practices and other allowable alternatives to substances recommended for removal from the National Organic Program's National List of Allowed and Prohibited Substances.***

Attention to production issues as they relate to evolving organic standards is an important area of research, especially for producers who are undertaking the challenging process of organic transition. Thank you for the continued emphasis on the development of cultural practices and other allowable alternatives in organic practices. This is a key issue for transitioning farmers, and one that needs strong research support.

***Include emphasis on the study of the efficacy and environmental sustainability of approved products included on the National List of Allowed and Prohibited Substances.***

One of the biggest challenges identified by organic farmers is understanding the efficacy of allowed products included on the National List of Allowed and Prohibited Substances. Often times the lack of in-depth field research and proven efficacy in controlled tests makes it difficult for organic farmers to make wise choices, and especially for transitioning farmers who face an immediate need to replace NOP-prohibited inputs with NOP-allowed substances. Both organic and transitioning growers cannot afford to squander time and money on ineffective substances, and they suffer if there is a lack of local field research and knowledge.

## **A. Suggested Edits to the Legislative Authority and Background**

“In FY 2018, ORG will continue to prioritize ecosystem services provided by organic farming systems in the area of soil health, water and soil conservation, pollinator health, and climate change adaptation and mitigation, as well as the management of disease, insects, weeds, and fertility in organic systems and during organic transition. ORG will also continue to prioritize the development of educational tools for Cooperative Extension personnel and other agricultural professionals who advise producers on organic practices and transition strategies, and development of cultural practices and other allowable alternatives to substances recommended for removal from the National Organic Program's National List of Allowed and Prohibited Substances, as well as reviewing the efficacy of allowed substances on the aforementioned national list. It is expected that all projects will integrate research, education and extension activities, as appropriate to project goals, although some projects may be weighted more heavily than others in one or more of these areas. However, all proposals should have activities and impact in research and at least one of the other areas: education and extension.”



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## **RECOMMENDATIONS FOR PROGRAM PURPOSE (Pg. 6)**

***Retain the goals of supporting the development and implementation of research, extension, and education to improve the competitiveness of organic livestock and crop producers, and increase program emphasis on providing practical information and tools that help transitioning producers successfully adopt organic practices***

Despite the increasing demand for organic food and farm products and double-digit annual sales growth, U.S. organic production is currently unable to meet consumer demand. There are several barriers to organic production as well as organic transition that can be overcome by supporting development and implementation of research, extension, and education to support farmers who are transitioning to organic agriculture.

***Retain and bolster the expectation that applications shall contain descriptions of stakeholder involvement in problem identification, planning, implementation, and evaluation.***

Stakeholder input is vital to the success of research into organic and transitioning agricultural systems. We encourage NIFA to elaborate on this stakeholder involvement to include farmers, non-profit organizations, and others to ensure well rounded problem identification, planning, implementation, and evaluation. In light of the statutory provisions that stipulate that applications may only be submitted by colleges and universities as defined in section 1404 of the National Agricultural Research, Extension, and Teaching Policy Act of 1977 (NARETPA, 7 U.S.C. 3103), and as amended by sections 7101 and 7129 of the Food, Conservation, and Energy Act of 2008 (Public Law (P.L.) 110-246, sections 7101, 7129 (c) (4)) to define Hispanic-serving Agricultural Colleges and Universities (HSACUs) and to include research foundations maintained by eligible colleges or universities, we strongly support the encouragement of the expectation that stakeholders are involved in every step of the process.

***Retain the requirements that projects should plan to deliver applied production information to producers, students, or their information providers.***

This is crucial, especially for practice production information that helps address challenges facing farmers who are making or seeking to make the transition to organic production.

### **B. Suggested Edits to Program Purpose**

“The goal of the ORG program is to support the development and implementation of research, extension, and higher education programs to improve the competitiveness of organic livestock and crop producers, and especially to provide practical information and tools for those who are in the process of adopting organic practices.”

## **RECOMMENDATIONS FOR PROGRAM PRIORITIES (Pg. 6)**

***Retain the emphasis on better understanding and documenting organic practices to highlight the environmentally sound and sustainable production practices of organic agriculture. Increase program emphasis on development of practical information and tools to support farmers in making a transition to organic.***



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Organic agricultural practices provide many environmental services and contribute to sound stewardship of our land and natural resources. We are encouraged that the program prioritizes the better understanding and documentation of organic practices. While the RFA listed the areas of conservation practices, pollinator health, climate change mitigation, including the reduction of greenhouse gas emissions, we feel that while these are excellent priorities that can be better understood and documented in organic production, that the RFA should not be limited to only these topics.

If it is in the best interest to provide a list of environmental services, we recommend that the list include but not be limited to conservation practices, pollinator health, biodiversity, soil health, soil and water conservation, weed, disease and pest management, ecosystem services, climate change adaptation and mitigation, including the reduction of greenhouse gas emissions.

## **C. Suggested Edits to Program Priorities**

“Organic agricultural systems and practices provide many environmental services, and environmental stewardship is a key principle in organic farming. For example, the use of cover crops, crop rotation, and erosion control; proper manure management; and livestock operation guidelines are cross-compliant with many Natural Resources Conservation Service (NRCS) practice standards. How specific practices and combinations of practices interact in organic systems—including their contributions to conservation outcomes, resilience to weather extremes and other stresses, and climate change mitigation potential—is neither well documented nor understood, especially in the case of long-term organic soil management. The most meaningful metrics or models to quantify these services in organic systems are also not clear. A better understanding and documentation of these outcomes will allow for the adjustment of organic practices in order to optimize environmental services and to quantify and document those services. This information will help farmers better assess the financial benefits and costs of their practices and improve their ability to understand the impacts of production practices. . This process will also help justify consumer expectations that certified organically-grown food is produced using the most environmentally-sound and sustainable production practices possible.

To be successful and sustainable, organic agriculture also needs essential ecosystem processes and components, such as soil conservation and soil health, water quality, pollinators and other beneficial organisms, and aboveground and belowground biodiversity, to be intact. Building system capacity for these processes is an essential requirement for successful adoption of organic practices during the transition process, especially on land that does not have a history of organic or sustainable management. This requires better understanding and assessment of the contribution of organic agricultural systems to maintaining biodiversity, soil health, and water quality.”

## **RECOMMENDATIONS FOR PRIORITY 1 (Pg. 7)**

We support retaining an emphasis on documenting and understanding the effects of organic practices, but this should not be limited to crop rotation, livestock crop integration, organic manure, mulch and/or compost additions, cover crops, and reduced or conservation tillage on ecosystem services, greenhouse gas mitigation, and biodiversity. We strongly recommend that this priority include all of these organic practices, but should also include documentation and understanding of the use of other cultural practices, as well as allowed substances on the National Organic Programs list of National List of Allowed and Prohibited Substances.



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In addition to documenting and understanding the effects of organic practices on ecosystem services, there is an increased need for documentation and understanding of the effects of organic practices on soil health, plant and livestock resistance to pests and diseases, production outcomes, and adaptation to unpredictable changing weather and other ecosystem stressors.

Finally, the inclusion of project examples in the RFA is confusing. It is unclear if the examples are of past successful projects, or examples of specific proposals that the USDA is looking for. We recommend that future RFA's remove the examples.

## **Suggested Edits for Priority 1:**

“ Documenting and understanding the effects of organic practices, including but not limited to crop rotation, livestock-crop integration, organic manure, mulch and/or compost additions, cover crops, reduced or conservation tillage, other cultural practices, and allowed substances on the National Organic Program's list of Allowed and Prohibited Substances on ecosystem services as well as soil health, water quality, plant and livestock resistance to weeds, pests and diseases, production outcomes, carbon sequestration and climate mitigation, adaptation to unpredictable changing weather and other ecosystem stressors, and biodiversity.”

## **RECOMMENDATIONS FOR PRIORITY 2 (Pg. 8)**

While we support the improvement of technologies, methods, model development, and other metrics within organic farming systems, we recommend amending priority 2 to remove the restriction of focusing only on the environmental services and climate change mitigation ability. The need for improved technologies, methods, model development, and other metrics to document and optimize organic farming systems and assist farmers in making the transition to organic should not be limited to environmental services but should instead focus on all aspects of crop, livestock, and integrated crop-livestock organic farming systems.

As in priority 1, the inclusion of project examples in the RFA is confusing. It is unclear if the examples are of past successful projects, or examples of specific proposals that the USDA is looking for. We recommend that future RFA's remove the examples.

## **Suggested Edits for Priority 2:**

“Improved technologies, methods, model development, and other metrics to document, describe, and optimize the production, agronomic, ecological and/or environmental outcomes of crop, livestock and integrated crop-livestock organic and transitioning-organic farming systems.

## **RECOMMENDATION FOR PRIORITY 3 (Pg. 8)**

Thank you for including this important subject as a priority. Please retain this key priority for organic research.



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## **RECOMMENDATIONS FOR PRIORITY 4 (Pg. 8)**

*Helping producers overcome barriers to organic transition is a top priority and could be elevated to priority 1 in order to reflect the importance of this issue.*

Addressing barriers to organic transition should be retained as an extremely high priority for this program. We respectfully suggest that this might be the first priority listed, to better reflect the focus of the Organic Transitions Program.

The number of farms and acres transitioning to organic certification is fairly flat, relative to demand. U.S. organic production is currently unable to meet consumer demand. There are several barriers to organic transition that can be overcome by supporting development and implementation of research, extension, and education to support farmers who are transitioning to organic agriculture. These include, but are not limited to, farm level production constraints, local and regional infrastructure obstacles, marketplace obstacles, and administrative/policy obstacles.

We also recommend amending policy priority 4 to include projects that address specific barriers and obstacles to organic transition on the farm level, local and regional level, within the marketplace, as well as administrative/policy obstacles.

### **Suggested Edits to Priority 4:**

“Develop practical information and tools to help producers overcome barriers to organic transition: Projects under this priority should address major barriers that limit the transition to organic agriculture in a specific region, crop or animal production systems. These can include, but are not limited to production challenges during the transition period, local and regional infrastructure constraints, marketplace challenges, and administrative/policy obstacles. The constraint must be identified by growers and other stakeholders. Proposals to improve production systems and management strategies for currently organic farms and ranches should be submitted to the Organic Agriculture Research and Extension Initiative (OREI).”