

April 19, 2017

Docket Clerk  
Promotion and Economics Division  
Specialty Crops Program  
United States Department of Agriculture  
Agriculture Marketing Service  
1400 Independence Avenue, SW  
Room 1406-S, Stop 0244  
Washington, DC 20250-0244

Docket: AMS-SC-16-0112

RE: Proposed Organic Research, Promotion, and Information Order

Thank you for the opportunity to submit comments on the United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS) proposed Organic Research, Promotion, and Information Order.

The Organic Farming Research Foundation (OFRF) is a national, public-interest organization founded in 1990 to foster the improvement and widespread adoption of organic farming systems. The organization's mission is to advance organic agriculture research, extension, and education to meet the information needs of a growing community of organic farmers, and to educate the public and policy makers about organic farming and research issues.

Through our work in organic research, OFRF regularly engages with organic farmers and researchers, and several serve on our Board of Directors. In 2016 we published the National Organic Research Agenda based on data collected from thousands of organic farmers around the country. We have also completed an in-depth analysis of USDA organic research programs (OREI/ORG). The comments and recommendations of OFRF are based on our extensive experience with organic farming systems research, management of research programs, and public policy on agricultural research.

#### Need for Increased Support for Organic Research

Since its inception the organic sector has experienced large growth in consumer demand, along with significant increases in organic operations and acres under organic production. The organic sector has developed into a \$43 billion industry, with \$6.2 billion in farm sales in 2015. However, U.S. farmers and producers struggle to keep up with the growing consumer demand for organic product.

The challenges of meeting consumer demand parallel the need for increased support for organic research. Investment in agricultural research is vital, and while federal support has been growing in several key research areas, federal investment into organic research has remained relatively stagnant for almost a decade. Annual funding of USDA's Organic Research and Extension Initiative (OREI), has remained at approximately \$20 million since 2008. The Organic Transitions Program (ORG) has remained at approximately \$4 million dollars since 2008.

There is a strong need within the organic sector for increased support for organic research, extension, education, information, outreach, and promotion.

### Research Funding and Administration

The organic sector is unique in that it is a multi-commodity sector with a full supply chain. Due to the multi-faceted and complex nature of organic systems and production, there are a wide variety of evolving research needs within the organic sector as detailed in OFRF's 2016 National Organic Research Agenda<sup>1</sup>. Organic producers face unique challenges, from the availability of organic seeds and adaptive animal breeds best suited to local soils, to pest, disease, and weather conditions, as well as managing soil health and fertility, all while using approved organic methods. The needs of **this growing industry** are continually evolving, and include concerns about food safety regulations, invasive pests, environmental and social issues, unpredictable and changing weather patterns, and biological threats. These issues, coupled with the regionally specific challenges of organic production, create an immense diversity of organic research needs.

As a full supply chain industry, it is important to ensure that research also includes social questions such as consumer preferences, marketing and distribution needs, and product development. The proposal allocates that no less than 25 **percent** of the funds shall be allocated to research. We support the majority of those funds being allocated to agricultural research as defined in § 1255.32(a). We also support the proposal's description of the complex research needs of the organic sector, both agricultural and other research needs, **which should** be preserved in the final version. The proposed order also ensures that research includes related education, extension, and outreach activities, **which are** important aspect of research that should be preserved within the research section in the final version.

Recognizing the complex regional specific challenges of organic production, § 1255.50(a)(3)(iv) of the proposal puts it squarely in the hands of the regional certified organic producer Board members to establish the priorities, including regional considerations, for investment in agricultural research. The need for regional considerations is important and should be preserved in the final version.

However, with the immense research needs within the organic sector and the potential to administer several million dollars in research funding, OFRF wants to ensure the seven regional certified organic producer Board members have an in-depth understanding of the complex and diverse needs of the organic agricultural sector and fully understand scientific agricultural research requirements.

### **Recommendations**

In order to ensure that the Board is establishing annual research priorities that meet the full needs of the organic sector, OFRF recommends that the Board assemble a research committee, made up of researchers and research organizations, to review research proposals and make recommendations to the Board regarding annual research priorities.

The Board should strive to invest research dollars into University research, USDA research, including as matching funds for USDA and foundation research funding, as well as both non-profit and for-profit organization led research. Because of the differences in organic production systems and the diverse needs within organic agriculture, which may or may not be fully represented by the regional organic producer Board members, agricultural research supported by funds collected through this proposed order should strive to involve producers, farmers, and/or ranchers in research project design and/or implementation.

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<sup>1</sup> "National Organic Research Agenda". Diana Jerkins and Joanna Ory. *Organic Farming Research Foundation* (2016)

In order to prevent potential conflicts of interest, no research funds should be used to directly support research conducted by any corporation, company, partnership, or any other legal entity represented by a member of the Board, unless in partnership with a University, research organization, or USDA researcher.

We would be remiss if we did not point out the diverse needs of the organic sector would be better addressed by allocating a higher percentage of the fund to research.

#### Information

OFRF approves of the definition of the information programs as outlined in § 1255.18. Vital to the support of organic agriculture are the provisions within this section to increase organic production, support the transition of acres and farms to organic production in the United States, provide technical assistance, and the producer information outlined in § 1255.18(c). These and the other information provisions are important to the organic sector, and should be retained in the final version.

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