



ORGANIC FARMING RESEARCH FOUNDATION

Fostering the improvement and widespread adoption of organic farming.

I. Agency Recommendations

A. National Institute for Food and Agriculture

Relevant Programs:

- Organic Agriculture Research and Extension Initiative (OREI)
- Organic Transitions (ORG)
- Agriculture and Food Research Initiative
- Specialty Crop Research Initiative
- Sustainable Agriculture Research and Education

Overarching Recommendation

- **Expand USDA funding for research, education, and outreach in organic production systems in the agency's budgets, both through the Organic Agriculture Research and Extension Initiative (OREI) and Organic Transitions Program (ORG), and through other relevant NIFA programs, including Sustainable Agriculture Research and Education (SARE), Agriculture and Food Research Initiative (AFRI), Specialty Crop Research Initiative (SCRI) and other extramural competitive grants programs.**
 - Current funding levels should be at least tripled so USDA-funded organic research is at a level commensurate with the organic industry's six percent market share.

OREI and ORG Recommendations

- **OREI and ORG RFAs should prioritize the development of integrated practical approaches to enhancing climate change adaptation (resilience), sequestering carbon, and minimizing GHG emissions in organic farming and ranching systems.**
 - During 2010-14, ORG funded a number of in-depth studies to measure and model greenhouse gas emissions and net carbon sequestration in organic *versus* conventional systems. These projects yielded important new knowledge and identified challenges both in measurement methodologies and in optimizing organic systems for production and climate mitigation. Since then, the technology of in-field, real-time field monitoring of soil carbon, nitrogen, and moisture dynamics, and soil and crop condition has continued to make major advances. Meanwhile, as climate change reaches crisis levels for many agricultural regions, producers urgently need science-based *practical* information and tools to maintain production and economic viability in the face of climate disruption, while contributing to climate mitigation and carbon sequestration.

- **Invite proposals for a meta-analysis of previous research endeavors (OREI, ORG, and other) on carbon sequestration and GHG mitigation in organic systems, and on co-management of soil quality, plant nutrition, and weeds in organic systems.**
 - Outcomes of such meta-analyses can complement and inform practical climate mitigation and adaptation strategies.

- **Continue to expand research into organic livestock and poultry production, including classical and farmer-participatory animal breeding for pasture-based organic systems, animal health and parasite management, improved forage and grazing management, and crop-livestock integrated systems.**
 - We appreciate that over the past few years, RFAs for OREI have included livestock breeding and management for organic systems as priorities, that both OREI and ORG include crop-livestock integration in RFA priorities, and that several major awards have supported breeding, parasite management, grazing, and forage management practices for organic dairy and other livestock.

- **Expand OREI and ORG funding for crops that have been historically under-represented in USDA organic research.**
 - These include rice, cotton, specialty grains (quinoa, amaranth, barley, ancestral wheats, etc.), dry beans and other pulses, tree fruits, and other perennial horticultural crops, mushrooms, apiary (bees), etc.
 - We appreciate that a number of OREI and ORG awards in recent years went to support organic production of these commodities and look forward to continuation and acceleration of this trend.
 - In addition to enhancing the economic viability of diversified organic enterprises that include these products, better information on organic production of field crops other than corn, soy, and wheat will support crop diversification, which is vital for soil health, organic pest and disease control, and overall agricultural resilience.

- **Continue and expand OREI support for classical and farmer-participatory plant breeding and public cultivar development for organic systems, especially in the Southern region, which lacks the strong organic farmer-participatory plant breeding networks that serve other regions.**
 - The 2020 RFA lists a number of breeding goals important for organic systems, such as nutrient efficiency and weed competitiveness. Future RFAs should add water efficiency, resilience to weather extremes related to climate change, and enhanced association with beneficial soil microbes to the list.

- **OREI and ORG should follow the lead of the Sustainable Agriculture Research and Education (SARE) program by (1) developing publicly available, searchable databases of all projects and (2) adopting outcomes-based reporting, providing user-friendly links to major outcomes for each project.**
 - These two steps will help increase farmer adoption rates of research innovations in organic agriculture and help support and guide additional research in organic agriculture.

- **For OREI, ensure a balance of funding for smaller research proposals with specific goals and low-cost study methods, with larger, more complex, and multi-institutional projects.**
 - While a three-tier structure for project types (targeted, up to \$500,000; regional up to \$1,000,000; and multiregional up to \$2,000,000) has been adopted by OREI since 2015, only six projects in the targeted tier have been funded between 2015 and 2019, compared to 20 regional and 33 multiregional projects.
 - While all ORG projects have a \$500,000 funding limit, the focus of this program differs sufficiently from OREI that greater attention to funding highly qualified smaller OREI proposals is warranted.
- **Expand support for graduate student-led organic research through OREI and ORG.**
 - Continue to offer Curriculum Development Grants and Conference Grants including Breakthroughs in Organic Agriculture (BOA) through the OREI.
 - Recruitment and education of the next generation of organic researchers and plant breeders, and opportunities for information and idea exchange among researchers, producers, and other stakeholders are vital to the advancement of the science of organic agriculture.
- **Continue to utilize the annually published research priorities of the National Organic Standards Board (NOSB) to inform USDA organic research priorities, especially for ORG.**
 - One of the priorities of ORG is to identify NOP-compliant pest controls, including natural alternatives to substances on the National List of allowed synthetic materials, which periodically “sunset” and require reassessment by NOSB.
- **Ensure that federally funded organic research is tracking the needs of organic producers.**
 - OFRF routinely conducts surveys, supported by OREI funding, to determine the research needs of the organic community. The next National Organic Research Agenda (NORA) report is scheduled to be published in 2021 and OFRF will provide copies to USDA staff.

Recommendations for Other Competitive Grants Programs

- **Establish organic agriculture as a priority within RFAs for the Specialty Crop Research Initiative, Sustainable Agriculture Research and Education, Agriculture and Food Research Initiative (especially the Sustainable Agricultural Systems (SAS) and Foundational and Applied Science (FAS) programs) and other relevant NIFA competitive grants programs.**
 - Ensure that all RFAs explicitly include research, education, and extension for organic agriculture.
 - Include language in the RFAs reflecting the ways in which organic agriculture can contribute to the program’s goals.
 - Provide guidance for proposal reviewers to award organic projects that meet RFA qualifications.

- Include persons with expertise in organic production systems on all relevant review panels.
- Modify future AFRI RFAs to reflect organic agriculture’s contribution to SAS and FAS goals. While current RFAs note that projects for “conventional, organic, and urban” (or “protected”) production systems may be funded there is no recognition that organic systems and practices contribute to SAS or FAS goals, and thereby merit consideration in proposal evaluation.

B. Agricultural Research Service

Relevant Programs:

- All National Programs in Animal and Crop Production and Protection, Natural Resources and Sustainable Agricultural Systems, and Nutrition and Food Safety/Quality
- Sustainable Agriculture Systems Research (National Program #216)
- Long Term Agroecological Research (LTAR) Network

Overarching Recommendation

- **Expand funding for organic food and agriculture research across all ARS national programs to reach \$80 million a year, the dollar equivalent of the ARS research budget to organic’s 6 percent (and growing) share of the market.** To help reach that fair share goal, take the following three steps during FY 2022:
 - After a robust stakeholder listening process, develop a 5-year strategic plan for organic research at ARS.
 - Assign one National Program Leader from each of the four divisions (Animals, Crops, Natural Resources, and Nutrition) with responsibility for coordinating organic research within that mission area.
 - Expand organic research projects to at least \$20 million in FY 22, and plan on stair step increases in each of the next four years.

Recommendations for National Program 216

- **Establish organic farming and ranching systems as a priority topic within the Sustainable Agricultural Systems Research National Program (NP #216).**
- **Increase emphasis on organic systems within the Long Term Agroecological Research (LTAR) network by expanding organic farming trials to at least four different regions of the country.**
- **Highlight research to explore the contributions of organic agriculture to agricultural resilience and climate change mitigation.**

C. ARS and NIFA – Public Cultivar and Breed Development

- **Develop a comprehensive national plan to restore funding and institutional capacity for public plant and animal breeding, with a focus on regional adaptation, organic production systems, and climate resiliency.**
- **Elevate stakeholder engagement to identify and prioritize breeding needs of the agricultural community in the face of a changing climate, emerging regional food systems, and the growth in demand for organic commodities by:**
 - Holding a stakeholder input session early in 2021 to identify needs of stakeholders and develop a vision for a department-wide research initiative.
 - Directing USDA’s Research, Education, and Extension Office (REE) to coordinate public plant and animal breeding research activities within and between REE agencies and in close coordination with the National Genetic Resources Advisory Committee (NGRAC); and
 - Establishing a USDA agency-wide Seeds and Breeds Advisory Team that includes external stakeholders from the farming, ranching, and breeding communities.
- **Separately fund the Agriculture and Food Research Initiative (AFRI) Request for Applications on Public Cultivar and Breed Development at no less than \$20 million per year.**
- **Expand support for graduate student-led public plant and animal breeding research through AFRI, OREI, SCRI, and other funding mechanisms for graduate and post-doctoral research.**

D. Economic Research Service

- As part of rebuilding the agency, rehire an organic economic research point person for the agency and re-establish an active, robust organic food and farming economic research program at ERS.
- Ensure ERS continues to conduct organic research using the NASS and AMS data to support organic market research in terms of distribution, pricing studies, economic analysis, and access for smaller growers.

E. Organic Data Initiative (NASS, AMS, ERS, RMA)

- **Support the continued administration of NASS’s Organic Production Survey at regular intervals and in a manner that allows data to be compared over a series of years so that trends on the organic farming sector can be identified.**
 - Questions and collection intervals need to be consistent, but the survey does not need to be conducted every year. Organic production surveys have been conducted in 2007, 2008, 2011, 2012, 2014, 2015, 2016, 2017, and 2019, but there have been

inconsistencies that have limited their usefulness for identifying trends and being able to compare from year to year.

- **Support planned expansion of the Organic Integrity Database to integrate Organic Certifiers Survey to ensure that all data points previously collected as part of the survey continue to be captured in the database.**
 - Support efforts to preserve past Organic Certifier Survey data – through the Economic Research Service (ERS), National Agricultural Statistical Service (NASS), or Agricultural Marketing Service (AMS) – in one centralized and useable location. The survey was first conducted by ERS and is now being conducted by NASS with the goal of it being transferred to AMS in the future and there is a risk that the work from past surveys may be lost in the transitions.
- **Ensure that the Risk Management Agency (RMA) can fully collaborate with NASS on organic data sharing so RMA can support the creation of risk management products for organic producers.**
 - RMA cannot continue to expand price elections for organic producers without access to NASS production data.
- **Continue to support AMS Market News' expansion of its organic data collection to support RMA's Whole Farm Revenue Protection (WFRP) and organic-focused crop insurance products like contract price addendum and organic price elections.**
- **Collect, analyze, and make available to policy makers, researchers, producers, and the general public data on USDA REE mission area funding for organic farming and ranching systems by agency and program, as well as overall REE funding as a percentage of total funding for the mission area.**
 - Compile and publish this data on an annual basis so that year to year trends can be readily observed and assessed.

F. Farm Service Agency

Relevant Programs:

- National Organic Certification Cost-Share Program (NOCCSP)
- Conservation Reserve Program

Cost-Share Program Recommendations

- **Restore Organic Certification Cost-Share program payments to 75% or up to \$750 per operation and improve outreach and implementation for the remainder of the 2018 Farm Bill.**
 - Release a public report with clear and full accounting of spending for NOCCSP that includes an explanation for the lack of funding to continue the program at the 75% or up to \$750 cost-share payment level as authorized under the 2018 Farm Bill.

- **Include data on certification and inspection costs in NASS's Organic Production Survey and in the Organic Certifier Survey.**
 - As these costs increase, USDA should propose an increase in the maximum cost share payment level for congressional consideration in the 2023 Farm Bill.

CRP Recommendation

- **Restore the Organic Field Border Buffer Initiative that was started at the end of the Obama Administration but mothballed during the Trump years.**
 - Provide maximum flexibility by including a wide range of partial field practices that can be used as part of the field border arrangement.
 - Sign cooperative agreements with NGOs to do outreach and assistance to landowners for CLEAR, Grassland, and Field Border Buffers.

G. Risk Management Agency

Relevant Programs and Policies:

- Organic Price Elections
- Organic Contract Price Option
- Whole Farm Revenue Program (WFRP)
- Good Farming Practices
- Conservation Data

Administrative Actions

- **Continue to develop Organic Price Elections for additional crops; educate and train service providers in delivering crop insurance programs to organic producers.**
- **Remove the contract price addendum cap for organic price election.**
 - The artificial and unnecessary cap leaves farmers with contracts above the cap underinsured and thus far less likely to use the program.
- **Make improvements to the Whole Farm Revenue Protection (WFRP) program**
 - Further reduce paperwork and complexity by eliminating expense report requirements, limiting requests for additional documentation beyond tax records, and accepting records kept for Organic System Plans under the National Organic Program.
 - Protect farmers and program integrity by prohibiting adjustments to price and production expectations at the time of a loss claim.
 - Raise the growth expansion limit to allow farms transitioning to organic greater access to the program.
 - Provide additional training and education to agents and adjusters on the unique features of WFRP, and use cooperative agreements with NGOs, including organic farming groups, to do educational outreach to organic and other diversified producers.

- **Improve flexibility in cover crop guidelines for RMA crop insurance programs.**
 - Revise and re-issue the Cover Crop Termination Guidance to make it more farmer-friendly and to include a wider range of common cover crop practices.
- **Clearly establish all NRCS conservation practices and enhancements, including their adaptation and application in the context of organic systems, as Good Farming Practices for crop insurance eligibility purposes without exception or qualification.**
- **Conduct actuarial research to provide rationale for improved RMA crop insurance program premium subsidies and contract terms to reflect the benefits of added resilience (yield stability, smaller losses in “bad” years) resulting from organic and sustainable soil health management and conservation stewardship.**

H. Natural Resources Conservation Service

Relevant Programs:

- Environmental Quality Incentives Program (EQIP)
- Conservation Stewardship Program (CSP)
- Regional Conservation Partnership Program (RCPP)
- Conservation Reserve Program Transitions Incentives Program (CRP-TIP)

Overarching Recommendation

- **Build NRCS capacity to better serve organic producers:**
 - Establish at least one qualified organic coordinator in each state NRCS office
 - Provide in-service training on organic conservation for field staff
 - Train additional Technical Service Providers to help producers develop Conservation Action Plan (CAP) 138 for organic transition
 - Review conservation practice standards and enhancement job sheets to identify revisions that would make these activities more relevant and accessible to USDA certified organic and transitioning-organic producers.

Program Recommendations

- **Building on the CSP organic provision of the 2018 Farm Bill, create an entire CSP Organic Initiative.**
- **Create more options for organic and transitioning producers in CSP.**
 - Restore the organic-specific enhancements that were eliminated in 2017.^b
 - Ensure that payment rates include forgone income from transitioning to organic production.
 - Develop a comprehensive conservation planning option for organic and transitioning to organic producers that is integrated with the NOP Organic Systems Plan.

- Ensure that CSP allocations to the states are based on a full accounting of organic demand and production and that every state ranking pool includes an organic subpool.
- **Restore the original purpose of CSP to reward the nation’s best land stewards, which include many organic producers, by giving commensurate ranking and payment for maintenance of existing and ongoing conservation activities, and for implementation of additional (new) conservation activities.**
- **Implement and actively promote opportunities within the EQIP Organic Initiative for producers transitioning to organic methods.**
 - EQIP-OI should be redesigned to fully support producers throughout the conversion process, ensuring they are able to fulfill the conservation-related requirements of an Organic System Plan (OSP).
 - Include robust allocations to each state, based on organic demand and production, as well as targeted conservation practices and additional incentives. Additionally,
 - Clarify that EQIP participants who are transitioning to organic production (including participants who are exempt from organic certification due to their size) are not required to complete an OSP during the life of their contract.
- **Revise the EQIP Final Rule to include the following program purpose: “addressing identified, new, or expected resource concerns related to organic production” as mandated in the 2018 Farm Bill.**
- **Fund several On-Farm Soil Health Demonstration Trial projects through Conservation Innovation Grants that focus on the major contributions of organic agriculture to improved soil health and carbon sequestration.**

^b Prior to the 2017 “overhaul” of the CSP, Enhancements offered included transition to organic cropping system, transition to organic grazing system, and high level IPM for organic systems; non-chemical management of brush, noxious weeds, and invasive plants; nonchemical management of livestock pests, pathogens, and parasites; deriving $\geq 90\%$ of farm N needs from legumes, organic amendments, and soil organic matter; deriving ≥ 40 lb N/ac from legumes; improving distribution of manure through placement of hay during winter feeding; on-farm composting of farm-generated organic residues; and reducing import of nutrients in livestock feed by improved nutrient cycling in crop-livestock integrated systems. These were all eliminated when the 2017 overhaul required that all CSP enhancements be linked to an EQIP Conservation Practice Standard. The Nutrient Management Standard (CPS 590) as currently written is designed for management and efficient use of soluble fertilizers and is thus poorly aligned with organic systems. Neither CPS 590 nor the related CSP enhancements takes significant account of biologically based nutrient cycling, retention, and delivery to crops in organic and sustainable farming and ranching systems.

II. Budget Requests

Research Budget Request Recommendations

We urge USDA to prioritize bringing organic agricultural research up to its fair share of the REE budget by increasing the budget request to at least six percent of the total annual budget for the Research, Education, and Economics mission area, or about \$220 million per year, within its first two budget proposals. Current USDA funding for organic research totals less than two percent of the agency's research spending. We recommend the agency propose doubling the current investment in the FY 2023 budget request and tripling current investment in the FY 2024 request.

OFRF welcomes the substantial increase in mandatory funding for OREI in the 2018 Farm Bill, to reach \$50 million in FY 2023, as well as the modest increase in discretionary ORG funding to \$7 million as of FY 2021. Given the important and complementary roles that these two programs play in advancing organic production, both programs should be expanded, but also supplemented with increased investments in organic research through intramural research programs at ARS and through other NIFA programs like AFRI, SCRI, and SARE.

We recommend the following specific requests in the annual budget request:

- Propose an increase for the ORG program to \$10 million for FY 23 and \$15 million for FY 24.
- Propose an appropriation for OREI of \$20 million for each of FY 23 and FY 24.
- Dedicate at least 6 percent of the AFRI budget proposal to organic research.
- Propose to invest at least \$80 million per year in ARS research funding for organic research by FY 26, with significant increases proposed for each fiscal year beginning with FY 2022. In recent years, ARS organic research has fallen to just \$12 million, or less than 1 percent of total ARS research spending.
- Propose in USDA's budget for FY 2023 to devote approximately six percent of Economic Research Service (ERS) research, analysis, and outreach to organic farming, ranching, food processing, and marketing.
- Track organic research funding across USDA research programs and provide a report on that data to the public, stakeholders, and policy makers on a yearly basis.

Cost-Share Recommendation

- We urge USDA to request sufficient appropriated funding in both FY 22 and FY 23 to restore the Organic Certification Cost-Share Program to the level needed to restore payments to a maximum of \$750 per scope.

- We also urge the Department to request a change in the farm bill's formulation of mandatory funding for the Organic Certification Cost-Share Program so that the mandatory funding is for such sums as will be required rather than for a specific dollar amount so that we do not repeat the 2018 Farm Bill's cycle episode of being short of funds.
- Finally, we urge USDA to do a full investigation of the average costs of certification and to propose an increase in the maximum payment amount per scope that more closely matches current producer costs.