



ORGANIC FARMING RESEARCH FOUNDATION

Fostering the improvement and widespread adoption of organic farming.

303 Potrero Street, Suite 29-203
Santa Cruz, CA 95060
March 30, 2022

To: USDA National Organic Program
From: Organic Farming Research Foundation
RE: Docket No. AMS-NOP-21-85 (document number 2022-02429)
Federal Register Notice 87 FR pages 6839-6842, February 7, 2022
USDA National Organic Program public listening session, March 21, 2022.

On behalf of the Organic Farming Research Foundation (OFRF), we would like to submit the following written comments pursuant to the March 21 public listening session regarding upcoming Standards development and specific recommendations received from the National Organic Standards Board (NOSB).

OFRF (<https://ofrf.org>) works nationwide to foster the improvement and widespread adoption of organic farming systems through research, education, and federal policies that bring more farmers and acreage into organic production. Our top priorities include helping organic producers to meet the challenges of climate change and to contribute to climate solutions through best management practices for soil and agroecosystem health. Extensive research shows that organic systems have great potential to sequester carbon, reduce greenhouse gas (GHG) emissions, and enhance resilience to climate disruption. To realize and enhance this potential, the USDA must first recognize the organic method, as codified in the NOP Standards, as a climate-friendly, soil health-enhancing, and resource conserving agricultural system. Second, USDA must increase its investment in organic farming research and technical and financial assistance to organic and transitioning producers to implement conservation activities. Finally, NOP must update its Standards to both require and support certified organic farmers and ranchers to achieve and maintain high levels of soil, climate, and resource stewardship.

Some agricultural professionals continue to perceive USDA certified organic primarily as a market niche, and hold the opinion that the organic industry must demonstrate that it is indeed climate-friendly and can play a substantial role in the USDA's Climate Smart Agriculture and Forestry strategy and programs. Based on an extensive review of relevant research, we find that best organic management can greatly reduce net GHG footprint of a farming operation, as well as building agricultural resilience to climate disruption. At the same time, we are deeply concerned that the conversion of native ecosystems for the purposes of "USDA certified organic" production will undermine both the reputation and the efficacy of organic agriculture as a climate solution. Therefore, OFRF strongly urges NOP to enact without further delay the

NOSB recommendation to Eliminate Incentive To Convert Native Ecosystems to Organic Production, submitted in April 2018. Specifically, we urge you to adopt the following new language submitted by NOSB:

Under § **205.2 Terms Defined**, add:

“Native Ecosystems definition: Native ecosystems can be recognized in the field as retaining both dominant and characteristic plant species as described by established classifications of natural vegetation. These will tend to be on lands that have not been previously cultivated, cleared, drained or otherwise irrevocably altered. However, they could include areas that have recovered expected plant species and structure.”

Under § **205.200 General** add the following language:

“(a) A site supporting a native ecosystem cannot be certified for organic production as provided for under this regulation for a period of 10 years from the date of conversion.”

It is our understanding that this NOSB-proposed language would not prohibit wild-harvesting of certified organic products from a native ecosystem in a manner compliant with § **205.207 Wild-crop harvesting practice standard**, as this does not entail conversion or significant disturbance to the native ecosystem. OFRF recommends that this point might be clarified in supplementary Guidance documents pertaining to this issue.

NOP Standards require certified producers to protect, maintain, and improve the resources of the operation including soil, water, wetlands, woodlands, and wildlife; and to conserve and enhance biodiversity. Native ecosystems within or near farming operations conserve resources and biodiversity, providing habitat for pollinators, natural enemies of crop pests, and other beneficial organisms. In addition, native ecosystems sequester carbon in soil and perennial plant biomass and help mitigate the impacts of climate disruption on agriculture by ameliorating local microclimate and thereby contributing to resilience to weather extremes.

As currently written and implemented the NOP Standards inadvertently create an incentive to clear forest, plow prairie lands, or otherwise convert native ecosystems into organic cropland. The required three-year transition period after the final use of a synthetic fertilizer, pesticide or other NOP prohibited substance is highly appropriate and essential for organic production on agricultural lands with a non-organic management history. However, crops planted immediately after clearing native vegetation can be sold as certified organic, even though this conversion entails a sharp decrease in biodiversity, destruction of wildlife habitat, and likely increased risks of soil erosion and water quality degradation.

Furthermore, conversion of forest, prairie, or grassland into cropland inevitably entails a major loss in soil and biomass organic carbon, resulting in a sharp increase in net GHG emissions, even if the cropland is under best organic management. Research has shown that today’s cropland contains, on average, about 55% of the original soil organic carbon (SOC) that was present in the native ecosystem. Adoption of best organic management practices for several decades can restore SOC to 80% or original levels (Lal, 2016, *Beyond COP21: Potential challenges of the “4 per thousand” initiative*. J. Soil & Water Conserv. 71(1): 20A-25A). Thus, while converting

conventional cropland to organic production under best management practices is clearly “climate-smart,” conversion of native ecosystems for organic production will cause a substantial net loss of soil and biomass carbon with concomitant CO₂ emissions.

Now that the climate crisis poses mounting threats to agricultural production and food security nationwide, it becomes more urgent than ever to protect and expand natural areas that sequester carbon and help buffer farms, ranches, and rural communities against increasing weather extremes. Organic farmers and certifiers report that significant acreage has undergone conversion from native ecosystem into organic production in the US (Biron, 2021, U.S. 'loophole' can push organic farmers to destroy wildland, <https://news.trust.org/item/20210714074802-hwyu2/>). Thus, in order to strengthen the case that organic is resource- and climate-friendly and is a leading part of the solution to the climate crisis, NOP must act immediately to eliminate the incentive to convert native ecosystems for organic production. The proposed NOSB language would effectively remove this incentive.

We understand that new and transitioning organic farmers face challenges in choosing and prioritizing fields for organic cropping. Considerations include management history and date of last use of NOP-prohibited substances, soil type and current soil condition, and overall suitability of the land to organic production. However, in addition to causing harm to soil, environment, and climate and violating NOP standards that require producers to conserve natural resources and biodiversity, conversion of native ecosystems for crop production, especially woodlands that require tree stump removal and often have acidic soils, can entail low productivity and difficult management for several years after conversion.

Taking the three years to transition conventional farmland to organic may offer a smoother path for the farmer, and it yields ecological and societal benefits through regeneration of depleted soils in lieu of destruction of native plant communities and wildlife habitat. Thus, enacting the 10-year waiting period between native ecosystem conversion and organic certification can benefit producers as well as resources, climate, consumers, and society as a whole.

Furthermore, consumers expect USDA certified organic food to be produced in ways that protect natural resources and promote biodiversity. As the climate crisis mounts, consumers increasingly seek climate-friendly agricultural products as well. Therefore, the current loophole that allows native ecosystem conversion to organic production compromises the integrity of the USDA certified organic label by undermining consumer trust that organic foods are Earth-friendly as well as grown without the use of synthetic agrochemicals.

Finally, new, transitioning, and expanding organic operations often bear a significant financial burden during the three-year transition period when the organic price premium is not yet available and yields may decline temporarily. These diligent land stewards can face unfair competition from other producers in their locale who choose to break native prairie or clear native forest in order to gain immediate access to the organic price premium.

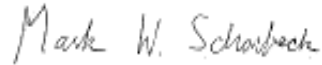
It is for these reasons that OFRF strongly recommends that NOP adopt the 2018 NOSB recommendations regarding native ecosystem conversion to organic production be adopted and implemented without further delay.

Thank you for taking these considerations into account as you review NOSB recommendations and update the NOP Standards.

Sincerely,

A handwritten signature in cursive script that reads "Brise Tencer".

Brise Tencer, Executive Director
Organic Farming Research Foundation.

A handwritten signature in cursive script that reads "Mark W. Schonbeck".

Mark Schonbeck, Research Associate