



December 15, 2020

Marketing Order and Agreement Division
Specialty Crops Program, AMS, USDA
1400 Independence Avenue SW, STOP 0237
Washington, DC 20250-0237

RE: **Survey of Hemp Producers and Production Trends**
Doc. No. AMS-SC-20-0071

Thank you for this opportunity to provide comment on the U.S. Department of Agriculture (USDA) Agriculture Marketing Service (AMS) Survey of Hemp Producers and Production Trends.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. Our mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

We support AMS's intent to collect data on hemp production through a producer survey. The data collected through this survey will be helpful in understanding the dynamics of production costs, production practices, and marketing practices of the emerging hemp industry in the United States.

We request that data is collected and reported in a manner that differentiates certified organic production. Under the authority of 2018 Farm Bill and subsequent policy clarification¹ by the USDA National Organic Program, hemp produced under the new USDA Domestic Hemp Production Program can be certified organic if produced in accordance with USDA organic regulations. Production practices, costs, and marketing practices in organic production can be very different from the rest of agriculture. Data exclusive to certified organic hemp production will enhance the quality, utility, and clarity of the survey for the organic sector, one of the fastest-growing sectors of agriculture. Reliable data about the organic hemp sector can be used to shape future decisions regarding farm policy and resource needs that are unique to certified organic domestic hemp producers.

On behalf of our members across the supply chain and the country, we thank USDA for the opportunity to comment.

Respectfully submitted,

Johanna Mirenda, Farm Policy Director, Organic Trade Association

cc: Laura Batcha, Executive Director/CEO, Organic Trade Association

¹ <https://www.ams.usda.gov/sites/default/files/media/NOP%202040%20Hemp%20Instruction.pdf>