



By email to: ombofficer@nass.usda.gov

May 6, 2019

Kevin L. Barnes
Associate Administrator
National Agricultural Statistics Service
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250–2024

Re: Docket number 0535-0249, 2019 Organic Survey

Dear Mr. Barnes:

Thank you for the opportunity to comment on reinstatement of the 2019 Organic Survey (Federal Register, Vol. 84, No. 40). The Natural Resources Defense Council (NRDC), which has over 3 million members and activists, strongly supports reinstatement of the organic survey. Our members care deeply about protecting public health and the environment. The “Organic” label remains the easiest and most reliable way to ensure that food is produced without toxic pesticides and with soil-building practices that combat climate change and make farms more resilient.

Current and comprehensive data on domestic organic production is critical to the ongoing growth and success of the U.S.’s organic industry. Reliable data is essential for policymakers, farmers, businesses, and crop insurance providers to make sound policy, business, marketing, and risk management decisions. Specifically, the data collected through the survey have a wide range of uses, including: informing the need for and types of policies that support organic farming, finding market opportunities and gaps, tailoring crop insurance for organic farmers, and identifying crops and issues that would benefit from organic-specific research. The data collected will be most useful if they are as granular as possible, to facilitate comparisons across regions, crops/animals, and farm types.

We urge the NASS to prioritize the following issues in the reinstated survey:

- **Production Expenses:** NASS should retain questions about production expenses in the survey. The production expenses section should address the costs of transition, organic certification, agricultural inputs (e.g., fertilizers, soil amendments), livestock feed, labor, marketing, and infrastructure. These data are critical to leveling the playing field for organic farmers and ensuring that organic food is accessible to people at all income levels.
- **Pesticide Contamination:** Organic farmers and farm workers may suffer health and economic harm from unwanted drift of pesticides onto their fields.

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The survey should collect information from farmers about unintended pesticide contamination.

- **Transition to Organic:** Transitioning more land into organic production protects communities and the environment from dangerous pesticide exposure and offers climate benefits. The survey should include questions about plans for transition, including expected acreage, expected crops/animals, and anticipated barriers (e.g., land availability and tenure, costs, market stability).
- **Barriers to Organic:** The survey should request more detail on challenges farmers face in maintaining certification. In addition, the scope of the survey should extend to farms where organic certification has lapsed in the last five years, to capture more information about factors that may drive producers out of the organic sector. This information will help USDA and organic advocates continue to strengthen the National Organic Program and secure resources that support its success.
- **Availability of Meaningful Crop Insurance:** Crop insurance options have not adequately met the needs of organic farmers, in terms of both risk and price assessment. However, progress has been made on this issue in recent years. The survey should track organic farmers' successes and challenges in securing and using federal crop insurance, so policymakers can better evaluate improvements to date, as well as areas where more action is needed.
- **Soil Health:** Organic farmers are required to "maintain or improve" soil, but specific practices may vary. The survey should document which soil-building practices operations use, including granular information about soil inputs, cover-cropping, crop rotation, and erosion prevention.
- **Biodiversity:** Organic farms provide important habitats for pollinators and other wildlife, but there is little data available to characterize this important public benefit. The survey should address both the amounts of land left uncultivated and the underlying reasons for those amounts.

Thank you for your work to reinstate the organic survey and for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Allison Johnson', with a stylized flourish at the end.

Allison Johnson, JD, MS
Sustainable Food Policy Advocate
Natural Resources Defense Council