



April 29th, 2019

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U.S. Department of Agriculture
Room 5336 South Building
1400 Independence Avenue, SW
Washington, DC 20250-2024

Re: Docket # 0535-0249, 2019 Organic Survey

The Ohio Ecological Food and Farm Association (OEFFA) is a grassroots coalition of over 4,800 farmers, gardeners, retailers, educators, and others who since 1979 have worked to build a healthy food system that brings prosperity to family farmers, safeguards the environment, and provides safe, local food. OEFFA employs education, advocacy, and grassroots organizing to promote local and organic foods, helping farmers and eaters connect to build a sustainable food system. OEFFA's Certification program has been in operation since 1981. OEFFA certifies more than 1,300 organic producers and food processors, ensuring that these operations meet the high standards established for organic products.

OEFFA appreciates the opportunity to comment on the 2019 Organic Survey that the National Agricultural Statistics Service (NASS) is reinstating and our recommendations follow.

As a USDA accredited organic certification agency, OEFFA is very aware of the tremendous growth in the organic industry as well as the issues facing both existing organic producers as well as those in the transition process. We provide educational services, resources and advocacy for organic producers and the industry as a whole and depend upon reliable data to guide our work. We also see, firsthand, how gaps in data have impacted our producers both in terms of the services and resources that are provided to them and their ability to make long-term investment decisions.

Recommendations

- (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

Aside from the clear benefits of the organic industry including exponential economic growth, reductions in negative externalities from agriculture and improved livelihoods for farmers and farmworker health, questions remain on yield data. This information will have practical utility for the agency when considering the impacts of differing production systems on a holistic basis.

Additionally, USDA NASS sister agency, the Agricultural Marketing Service (AMS) administers the National Organic Program (NOP) and works in coordination with the National Organic Standards (NOSB) to provide an ongoing review of program materials, process and policy issues for which the Organic Survey can and does provide data critical to proactive planning and decision-making.

This survey product should be conducted as a mandatory organic survey every five years as a follow on to the Census of Agriculture on an ongoing basis to inform the industry in the near-term and to allow for longitudinal analysis.

This is especially critical as we, as a society, look to our agricultural producers to provide ecosystem services such as clean water, increased soil organic matter, carbon sequestration, greater biodiversity and to help producers adapt to a changing climate.

(c) ways to enhance the quality, utility, and clarity of the information to be collected;

NASS is proposing to eliminate the section asking for data on the unintended presence of genetically modified organisms (GMO's) in organic fields and corresponding economic losses. While we do understand the difficulty in securing "clean" usable data from these questions, this is an ongoing reality that must be accounted for and tracked for the industry. In an internal survey that OEFFA conducted of its certified operations several years ago, we did find some confusion around terms and reporting especially confusion around genetic and pesticide contamination. As a result, we believe this section should be expanded to include pesticide contamination. This issue is being more pronounced with the use of products such as Dicamba which are quickly volatilized and cause significant damage to specialty crops.

Clarification and greater simplicity for the question may prove beneficial. Consider the following:

Have you had organic product rejected due to genetic contamination, or were you forced to take a conventional price for your organically produced commodity?

In practice, most producers learn of contamination when the product arrives for sale at the purchase point and PCR testing is conducted.

As the NOSB and NOP work to establish pilot projects and policies around genetic contamination this information is critical to gain a greater grasp on the scope of the problem. Producers are incurring two-fold financial losses, first as they remove land from production for buffer areas and secondly as their product is rejected or sold at conventional prices when higher production costs have been incurred through organic management systems. Many producers have changed their production systems to eliminate certain grain products as they incurred too many financial losses.

Also consider addition of this question to address pesticide contamination:

"Have you experienced any unintended chemical residue from pesticides prohibited by the National Organic Program?"

This information is critical to prevent the loss of organic producers at a time where demand outstrips supply, conventional producers are increasingly transitioning to organic for greater viability and society is looking to production systems with greater resilience.

OEFFA strongly opposes the elimination of questions around GMO contamination and inclusion of some form of the two questions presented above

We also understand that NASS is considering elimination of the Production Expenses section geared to report total production costs paid by farms and the percentage of their expenses used for organic production specifically. An understanding of the production expenses for certified organic production systems is critical as the market prices organic products. In discussions around differing production systems comments frequently refer to an “organic premium” as a way for producers to charge more without the understanding of the often-higher costs of organic management practices. This could be more intensive management time on the part of the producer, increased labor costs, higher seed prices, the costs of protecting organic product from contamination or other factors. Having a more thorough understand of the full line of production expenses is critical to understand the true costs of organic food production and, oftentimes, the need for higher prices. This information is also important for producers considering a transition to organic from conventional systems and for policymakers.

OEFFA strongly opposes elimination of the production expenses section.

We echo the comments made by the National Sustainable Agriculture Coalition (NSAC), the Organic Farming Research Foundation (OFRF) and the National Organic Coalition (NOC) that are detailed under section (d) and further concur with their recommendations on the following items:

Include more information regarding crop insurance availability in section 9

Crop insurance is a relatively new risk management tool for organic producers as price elections are still be added by the Risk Management Agency. Our experience has illustrated the fact that many organic farmers are not yet aware of the crop insurance options that are now available to them. Tracking their participation in federal crop insurance is important to show the levels of usage and also if greater outreach is necessary to inform producers of their risk management options. To facilitate why participation may be low further options to the survey should be included:

- *Too expensive*
- *Not available or offered for the organic crops produced*
- *Organic price elections not offered for the organic crops produced*
- *Agent unfamiliar with organic production or policies*
- *Other (specify)*

Disaggregate Green and Animal Manure

Section 13 asks about production practices for organic systems and includes a field for “green or animal manure”. We concur that these be broken out into two separate categories as they represent two distinct sources of nutrients with markedly different impacts on the soil and cropping system. Since green manure is simply a cover crop tilled into the soil, it is more appropriate that “cover crops and green manures” be shown as one practice, and “animal manures” as a separate practice.

OEFFA would also add that as we work to address water quality concerns at the state and local level it is even more critical to clearly delineate these practices and suggest NASS separate green manure from animal manure as asked in *b*, and create a new field with the following:

- h. Cover crops and green manures*
- i. Animal manures*

(d) ways to minimize the burden of collection of information

To provide greater clarity to the production expenses section, we concur with NSAC, OFRF and NOC that NASS mirror this part of the survey to the IRS Schedule F Form. Harmonizing, as much as possible, with Schedule F may prove to more user-friendly for farmers.

To further refine this section NASS can rephrase the opening statement with the following:

*“Report **total production expenses** paid by this operation in 2019 as reported on your Schedule F and the portion of those expenses used for organic production. (Do not include personal or living expenses.)”*

And then include the following list of expenses:

- *Organic certification expenses*
- *Fertilizers, lime and soil conditioners*
- *Crop protection materials for pest, disease, and weed control, including botanical and microbial pesticides and fungicides, beneficial insects, etc.*
- *Certified organic seed and plants*
- *Non-certified organic seeds and plants*
- *Labor hired (including contract labor)*
- *Livestock purchased or leased*
- *Feed purchased for livestock and/or poultry*
- ***Total Expenses (line 33, Schedule F)***