



May 6, 2019

Mr. David Hancock
NASS Clearance Officer
U.S. Department of Agriculture
Room 5336, South Building
1400 Independence Avenue SW
Washington, DC 20250-2024
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Re: docket number 0535-0249, 2019 Organic Survey

Dear Mr. Hancock:

Thank you for this opportunity to provide comment to the USDA National Agricultural Statistics Service (NASS) on the 2019 Organic Survey.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. We are 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. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

We strongly support the Organic Survey as a regular follow-on to the Census of Agriculture. This survey is critical to providing comprehensive and reliable information on organic agriculture, one of the fastest growing sectors of agriculture. Reliable public information about the organic sector can be used to help shape future decisions regarding farm policy, funding allocations, research needs, and availability of goods and services. The organic sector requires a sector-specific follow-on survey because organic industry trends are different from the agricultural sector as a whole, and therefore we need differentiated data. As shown in the 2017 Census of Agriculture, the total number of farms nationwide are decreasing (a drop of 3.2% from 2012), whereas the number of organic farms is growing (increased from 12,771 in 2012 to 17,741 farms in 2017). Farms are continuing to transition to meet USDA's National Organic Program production standards, according to the 2017 Census of Agriculture (3,723 farms reported they were transitioning acreage in 2017). In terms of the value of agricultural production, the total value has declined (\$388.5 billion in 2017, down from \$394.6 billion in 2012), whereas the value of sales of organic products is growing (increased 133% between 2012 and 2017 from \$3.1 billion to \$7.3 billion). Industry-wide, U.S. organic sales increased from \$30.42 billion in 2012 to \$49.36 billion in 2017 according to data from the Organic Trade Association.

The Organic Trade Association's top priority for the 2019 Organic Survey is to retain the section on "Production Expenses" (Section 12). NASS has indicated that it plans to remove this section in the 2019 Organic Survey. The Organic Trade Association strongly urges NASS to retain the section on "Production Expenses" in the 2019 Organic Survey. Without the information from this survey, the organic community will not be able to collect or readily track production data trends. The Organic Trade Association is willing to work with NASS and survey respondents to communicate best practices for completing this section of the survey to ensure that NASS receives accurate and useful data.

Information in the "Production Expenses" section is important to help identify areas of production where organic farms incur the most significant costs, which helps identify where research and other supportive resources can be directed. For example, the last Organic Survey in 2014 identified labor and feed as the two

highest expenses. These have become areas of focus within the organic industry for research, policy solutions, and technical assistance to help organic farms become more cost efficient.

Data on production expenses is also important for calculating the profitability of organic agriculture. In conjunction with organic sales data from Section 15, we can calculate net income and gain a better understanding of the economic balance and trends of organic production. Production expenses are an essential piece of the economic equation – although costs may be higher, organic farms also may see higher profitability. For these reasons, we strongly urge NASS to retain this section in the 2019 Organic Survey.

The expense line item “*Livestock purchased or leased*” is defined in the 2014 Organic Survey results as “These expenses include all breeding livestock and poultry purchased.” This line item should also include expenses of purchased replacement animals such as replacement heifers in an organic dairy operation.

We offer the following comments on other areas of the Organic Survey:

Section 10: GMO Presence in Organic Crops

NASS has indicated that it plans to remove this section in the 2019 Organic Survey. The Organic Trade Association encourages NASS to retain the section on “GMO Presence” in the 2019 Organic Survey. The continued tracking of this information is important for understanding future trends, and areas where research and other supportive resources can be directed.

Furthermore, we strongly urge NASS to expand this section (or add a new section with identical questions) to address “Inadvertent Pesticide Contamination” of organic crops (i.e. the presence of residues from prohibited pesticides on an organic crop that are not a result of the intentional, willful, or direct application of prohibited pesticides by the organic operator). Inadvertent contamination or crop loss from prohibited pesticides such as glyphosate or dicamba can adversely impact organic farms on par with GMO contamination. Collecting data on the economic impact of such contamination is important to understanding the current state of contamination, and to identify areas where research and other supportive resources can be directed.

Section 13: Organic Production Practices

We suggest adding the following practice to the list of organic production practices:

- Implement crop rotations to maintain or improve soil organic matter content, provide for pest management, manage plant nutrients, and/or provide erosion control.

Section 15: Other Information

Question 5 asks which of the following the respondent would consider the primary challenge as an organic farmer. The results of the 2014 Production Survey show that 20% of the responses said “other.” Therefore we suggest adding the following challenges to this list to address the other possible primary challenges facing organic farmers.

- Inadvertent contamination by prohibited pesticides or GMOs (leading to loss of market, price and/or organic certification)
- Lack of technical assistance information and advice (untrained county extension personnel, lack of knowledgeable farm advisors, lack of information and advice specific to organic, etc.)



- Lack of research necessary to overcome organic production challenges (weed control, soil building, no-till, etc.)

On behalf of our members across the supply chain and the country, the Organic Trade Association thanks the National Agricultural Statistics Service for the opportunity to comment.

Respectfully submitted,

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Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association