



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**

Submitted electronically to [ombofficer@nass.usda.gov](mailto:ombofficer@nass.usda.gov)

Dear Associate Administrator Barnes:

Organic Seed Alliance (OSA) is a mission-driven organization that works nationally to advance ethical seed solutions to meet food and farming needs in a changing world. Our research, education, and advocacy programs foster seed systems that are responsive to the needs of organic agriculture, resulting in more organic seed and more skilled organic seed producers.

We appreciate the opportunity to comment on the 2019 Organic Survey conducted by the National Agricultural Statistics Service (NASS).

As an organization that supports the growth and success of organic seed systems, we know that demand for organic seed still outstrips supply. Organic farmers are required to use organic seed unless it's commercially unavailable. As our five-year progress report (*State of Organic Seed*) shows, the organic seed supply isn't keeping up with broader organic industry growth, as most organic farmers still rely on conventional (non-organic) seed for at least part of their operation. There is an ongoing need to track organic seed usage and the cost of seed, and to identify supply gaps that can be filled by further investment in organic plant breeding and organic seed production. Collecting data through the 2019 Organic Survey is essential to supporting organic farmers' access to more organic seed, the critical first input in the production chain.

Our recommendations are based on the need to better understand growth in the organic sector, as well as identify barriers to continued expansion and transition. The recommendations that follow were developed in collaboration with the National Sustainable Agriculture Coalition (NSAC), National Organic Coalition (NOC), and Organic Farming Research Foundation (OFRF). We are available to provide support relating to seed-specific questions.

Sincerely,

A handwritten signature in black ink, appearing to read "KHubbard".

Kiki Hubbard  
Director of Advocacy & Communications

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## **Recommendations**

### **1. Retain the ‘GMO Presence in Organic Crops’ (Section 10)**

We encourage NASS to retain the section about the unintended presence of genetically modified organisms (GMO) in organic fields, and any corresponding economic losses. This section asked producers to document their most recent losses, including the year, organic crop, quantity affected, unit of measure, and the economic loss.

We recommend that NASS clarify and retain this section given the pertinence of this information on real-world issues that organic farmers face. GMOs are prohibited in organic production. However, the unwanted presence of GMOs is a risk faced by organic farmers that continues to lead to a number of consequences, including economic losses. The burden remains on organic farmers to protect their fields from GMOs by implementing buffer zones, delaying planting, and testing their crop. It's important, therefore, to account for the GMO-related challenges organic farmers face, including the costs incurred in implementing measures to prevent GMO trespass.

We suggest rephrasing the question to make it simpler for farmers to understand what information is being requested. Currently, it states:

*“Have you experienced economic losses that you can document due to the unintended presence of GMO material in an organic crop you have produced for sale?”*

We suggest NASS replace this question with the following:

*“Have you experienced any unintended presence of GMO material in an organic crop you have produced for sale?”*

Respondents should then be asked to itemize associated economic losses by year, crop, quantity, and unit as currently described. Understanding the losses, both in frequency and magnitude, will help inform efforts to protect organic farmers, their seeds and crops, and potential redress, whether economic, policy, or both.

### **2. Expand Section 10 to include ‘Unintended Presence of Pesticide.’**

Along with GMO presence, organic farmers face risks from the unwanted drift of pesticides onto their fields. Organic farmers are left to protect their organic crop from drift to maintain certification under NOP standards. We recommend NASS include an additional question in Section 10 to collect information from farmers about the unintended presence of pesticides in the 2019 Organic Survey. We suggest the following language:

*“Have you experienced any unintended presence of non-NOP approved pesticides on an organic crop you have produced for sale?”*

Respondents should then be asked to itemize associated economic losses by year, crop, quantity, and unit as currently described for the question above about GMO presence.

### 3. Retain questions on ‘Production Expenses’ (Section 12)

We understand that the Production Expenses section is under consideration for elimination. These expenses include costs for organic certification, agricultural inputs (e.g., seed), livestock feed, among others. This data is important in understanding which specific expenses are higher or lower for organic versus conventional production.

All farmers, but especially organic farmers, face unique production costs. Organic farmers must meet the standards set by the National Organic Standards (NOP) which outline the necessity of organic certification, procurement of organic seed when available, the use of pest control that meet the strict requirements set by the National Organic Standards Board (NOSB), among others. As mentioned above, organic farmers must also safeguard their farm from external risks, such as pesticide and GMO drift, all of which can be costly.

It is imperative we have an understanding of the average production costs for organic farmers that will not only help inform the true cost of organic food but provide policymakers greater insight into the needs of organic agriculture in terms of research around organic seed and risk management tools, as well as an understanding of what the financial limitations are for farmers in transition.

We urge NASS to retain the Production Expenses section in the 2019 Organic Survey. This section is a critical tool to determine financial hurdles faced by organic farmers. To provide clarity to this section, and facilitate greater understanding among respondents, we suggest NASS mirror this part of the survey to the IRS Schedule F Form. Harmonizing, as much as possible, with Schedule F may prove more user-friendly for farmers and increase response rates.

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 (percent) of those expenses used for organic production. (Do not include personal or living expenses.)*

And then include the following list of expenses:

- a) *Organic certification expenses*
- b) *Fertilizers, lime and soil conditioners*
- c) *Crop protection materials for pest, disease, and weed control*
- d) *Certified organic seed and plants*
- e) *Non-certified organic seed and plants*
- f) *Labor hired (including contract labor)*
- g) *Livestock purchased or leased*
- h) *Feed purchased for livestock and poultry*
- i) ***Total Expenses (line 33, Schedule F)***

### 4. Usage and Availability of Organic Seed

As mentioned above, an issue that continues to plague organic farmers is the availability of certified organic seed. The NOP allows organic farmers to source non-organic seed if organic varieties are unavailable in an equivalent form. How often farmers need to rely on non-organic seed and for which crops is useful information for plant breeders, researchers, extension,

certifiers, and policymakers. This data is also helpful in setting organic plant breeding and other organic seed research priorities by crop type and region. We strongly urge NASS to collect this information by adding an additional question on certified organic seed usage:

*Report the portion of certified organic and non-certified organic seed planted for organic crops you produced in 2019.*

<i>Organic Crop</i>	<i>Certified Organic Seed (Percent Acreage Planted)</i>	<i>Non-certified Organic Seed (Percent Acreage Planted)</i>
<i>CROP1</i>		
<i>CROP2</i>		
<i>CROP3</i>		

The above can be presented as a standalone section or included in Section 13, Organic Production Practices. Additionally, it would be valuable to know whether or not farmers are increasing or decreasing the percentage of certified organic seed used to grow organic crops, and could be included as a subsequent question.