



ORGANIC FARMING RESEARCH FOUNDATION

fostering the improvement and widespread adoption of organic farming

April 29, 2019

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

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Re: Docket Number: 0535–0249, 2019 Organic Survey

Submitted electronically via Regulations.gov

Dear Associate Administrator Barnes,

The Organic Farming Research Foundation (OFRF) is a non-profit organization working to advance organic agriculture through scientific research. As a champion of organic farmers across the U.S., OFRF works to foster the improvement and widespread adoption of organic farming systems by cultivating organic research, education, and policies that bring more farmers and acreage into organic production. Through these efforts, OFRF is working to create a more resilient and sustainable agricultural system that values healthy environments and healthy people.

The tremendous growth of the organic sector over the past few decades presents huge opportunities for USDA certified organic producers, businesses and other elements of the organic supply chain. Having reliable data on any agricultural sector is critical for policymakers, farmers, businesses, and crop insurance providers to make sound policy, business, marketing, and risk management decisions. For organic farmers, data on agricultural production are very useful in helping producers identify what sectors are strong, and where there is room for growth. These opportunities would not be as apparent without consistent, uniform data across these sectors, and projections for their future growth and overall economic health.

NASS's organic data collection has become a valuable and essential source of data on the health and emerging trends facing organic agriculture. We commend NASS for integrating this survey into its regular post-Census data collection activities, and urge NASS to continue gathering organic specific data in the future. Our recommendations are based on the need to continue to expand our understanding of the growth of the organic sector, as well as to identify barriers to continued growth and transition. We aim to support NASS's data collection efforts and look forward to partnering with NASS to ensure robust outreach and dissemination of the organic survey.



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Recommendations on Existing Questions

1. Expand Section 9 to include more information regarding crop insurance availability

Organic farmers have struggled to access crop insurance policies that are tailored to meet their needs and reflect the price premiums they are able to secure on the crops they grow. However, there has been much progress made by USDA to remove barriers and increase access to crop insurance for organic producers. The development and expansion of organic price elections for all organic crops and rollout of policies like Whole Farm Revenue Protection have helped to level the playing field for organic farmers, allowing the organic sector to expand. Tracking participation of organic farmers and barriers to accessing federal crop insurance is essential to provide the organic community and policymakers with valuable data necessary to evaluate whether these programs are adequately serving organic farmers.

Still, there are many hindrances to obtaining crop insurance for organic farmers. To improve our understanding of what these obstacles are, we suggest the expansion of Section 9, Question 2 to include the following response options (suggested additions underlined):

2. Which of the following best describes the reasons why crop insurance was not purchased for the uninsured organic acres in 2019? (Check all that apply):

- *Too expensive*
- *Not feasible for my operation*
- *I don't know enough about organic crop insurance*
- *I rarely experience major loss on my organic production*
- *Organic policies are not available for what I produce*
- *Crop insurance agents and adjusters are not familiar with organic production and/or policies for organic operations*
- *Other (specify)*

2. Retain the 'GMO Presence in Organic Crops' (Section 10)

We understand that NASS is proposing to remove the section inquiring about the unintended presence of genetically modified organisms (GMO) in organic fields, and any corresponding economic losses. However, we feel that this section is vital to better understand the challenges facing organic agriculture, as the burden is on organic farmers to protect their fields from GMO trespass by erecting buffer zones, delaying planting, and routine testing of their crop.

While we understand that this information is difficult to collect, we recommend the agency retain and clarify the questions in this section, as they ask very pertinent information on real-world policy issues that organic farmers face. GMOs are prohibited in organic production. However, GMO contamination is a serious risk faced by organic farmers that can have devastating consequences – including loss of access to a thriving organic market. It is important, therefore, to account for GMO-related challenges organic farmers face, including the costs incurred in implementing measures to prevent GMO trespass.



ORGANIC FARMING RESEARCH FOUNDATION

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We suggest rephrasing the question to make it simpler for farmers to understand what information is being requested. In the 2014 Organic Survey, the question reads:

*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? (**Exclude** expenses for preventative measures and testing of your crop.*

NASS should replace with the following:

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

This baseline information would be fairly straightforward to collect, and provide the organic community with a better understanding of a supposedly widespread issues. This question should be followed by requesting respondents to itemize associated economic losses by year, crop, quantity, and unit as currently described. We would urge NASS to retain question 1a of this section, to collect data on which crops were impacted, and the associated economic loss. Data generated by this question can help determine whether GMO contamination is prevalent, in which states, and help certifying agents be better prepared for investigating incidents of unintended contamination. It can also help identify precautionary strategies to assist farmers in protecting their crop.

Beyond the direct impacts that GMO contamination may have on access to organic markets, there is also an indirect cost that organic farmers bare to protect their production from unintended GMO contamination. Therefore, we also urge NASS to consider including additional questions that collection information on what actions were taken to prevent contamination (i.e. delayed planting, planting border rows, isolation).

Understanding the impacts of GMOs on organic production- both in frequency and magnitude - will help inform efforts to support organic farmers, their fields and the programs and policies implemented.

Retaining this question, with the suggested amendments, will help the USDA and the agricultural community better understand the impact GMO contamination has on organic farmers, as well as provide data for much-needed policy reformation.

3. Expand Section 10 to include ‘Unintended Presence of Pesticides.’

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

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

This would be followed by requesting respondents to itemize associated economic losses by year, crop, quantity, and unit as currently described for the question on GMO contamination. Further, we would



ORGANIC FARMING RESEARCH FOUNDATION

fostering the improvement and widespread adoption of organic farming

urge NASS to rename Section 10 to “Unintended Presence of Substances Not Approved for Use in Organic Production”.

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

Also, under consideration for elimination is the Production Expenses section which seeks to collect total production costs paid by farms and the percentage of their expenses used for organic production. These expenses include costs for organic certification, agriculture chemicals, livestock feed, repairs and supplies, among others. This data is extremely important in understanding which specific expenses (i.e. fertilizers, seeds, labor, feed) within organic production are costly. This information is vital to identify where research and resources can be directed to support thousands of organic farmers. In the last Organic Survey, labor and feed were some of the highest costs associated with organic production. Thanks to this information, these areas are now areas of focus for the organic sector.

All farmers, but especially organic farmers, face unique production costs. Organic farmers must meet the standards set by the National Organic Program (NOP) which outlines the necessity of organic certification, procurement of organic seed when available, the utilization 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 contamination of risks, all of which can be costly.

It is imperative to have an understanding of the average production costs for organic farmers that provides insight into the needs of organic agriculture in terms of research around organic seeds or risk management tools, as well as an understanding of what the financial limitations are for farmers in transition.

We therefore urge that the Production Expenses section be retained in the 2019 Organic Survey as it is a critical tool to determine financial hurdles faced by organic farmers. But, to provide clarity and facilitate greater understanding (and response rates) 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 or other tax forms, may prove more user-friendly for farmers, and increase response rates. This information will help organic community to analyze long-term profitability and future trends of the organic sector as input costs changes.

5. Expand Section 12 Production Expenses Related to Seed

In previous NASS surveys of organic producers, as part of the Production Expenses section, information has been gathered about the cost of seed, plants, vines, trees, etc. purchased. This information, while important to the organic sector, could be expanded on in order to gather information about usage and purchasing of certified organic seed, plants, vines, tree, etc. and the usage and purchasing of non-certified organic seed, plants, vines, trees, etc. that are not certified organic but are allowed in organic production under NOP guidelines which allow for use of non-organically produced seeds and planting stock under certain circumstances.

Therefore, we urge NASS to collect specific production expenses information on the cost of:

- *Certified seed, plants, vines, trees, etc.*
- *Non-certified seeds, plants, vines, trees, etc.*



ORGANIC FARMING RESEARCH FOUNDATION

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6. Expand Section 15

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 of 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.)

7. Transitional Acreage (Section 16)

One way to analyze the growth of organic agriculture is to measure land acreage being transitioned from conventional to organic production, and which commodities are intended for cultivation on the transitioned acreage. What type of land farmers are transitioning and how this decision to transition aligns with the demand for specific organically produced crops or livestock products is important to understand the factors contributing to the growth of the organic sector.

We are grateful that NASS included a question about farms that are transitioning acres into organic production as part of the 2017 Ag Census. However, for this survey we recommend that NASS expand Section 16 to include a question on plans for future transition of additional acres, and what crops will be grown on future acres transitioned. We would also urge Question 4 to be further broken down to ask about specific commodities grown on transitional acres (rather than generic “cropland”). This data can help analyze trends underlying market shifts and organic growth, as well as provide background information on the decision farmers make to expand their business.

Recommendations for Additional Questions

1. **Estimated percentage of land left uncultivated for on-farm biodiversity:**

Organic agriculture encourages the promotion of biodiversity. Additionally, many organic producers put in buffer strips or borders on their operations in an effort to prevent contamination. Yet there is little data currently available regarding how much organic farmland is currently left uncultivated for biodiversity or buffers. In addition to data on the amount of farm or ranchland left uncultivated, it would be important to ask the reasons for, and constraints against, preserving uncultivated land and deciding how much to preserve.

Suggested survey language:



ORGANIC FARMING RESEARCH FOUNDATION

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Of your total farmland, what percentage of your farmland do you leave uncultivated for the following purposes?

- a. On-farm biodiversity, including habitat for pollinators, natural enemies for pests, other beneficial organisms, and wildlife.*
- b. Buffer zones to protect organic fields and production areas from pesticide or GMO pollen drift, agrochemicals and pathogens in runoff, or other sources of NOP-prohibited substances.*

We appreciate the opportunity to provide feedback on the 2019 Organic Survey and remain available to discuss these and any other survey related issues that NASS may find useful.