



April 4, 2018

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National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW.,
Room 2642-S., Mail Stop 0268
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Submitted via www.regulations.gov

RE: Document #AMS-NOP-17-0057

NOSB CACS Subcommittee Proposal on Eliminating the Incentive to Convert Native Ecosystems to Organic Production.

Dear NOSB Members:

Thank you for the opportunity to provide comments on eliminating the incentive to convert ecosystems to organic production. MOSA certifies over 2000 organic operations, and the majority of these are farms in the midwestern United States. Many operations are located in ecologically sensitive or high value conservation areas, yet, in the regions we certify, we do not often see conversion of native lands to organic. However, when we do having a regulation and definition will be helpful in our regulatory work.

MOSA supports the basic principle of this proposal: a rule change noting that conversion of a native ecosystem site for agricultural purposes requires a 10-year wait period before the land can be used for organic production. We agree that 10 years would seem to be an adequate disincentive to converting native lands to organic production. The proposed definition for Native Ecosystems is a beginning for certifiers to identify such lands, but we agree with the Wild Farm Alliance that additional guidance will be needed. Certifiers and inspectors will need guidance for assessing native ecosystems in the field and in the office. Training and accessibility of resources will be necessary in order for certifier enforcement to be consistent.

We continue to have concerns about some of the suggested verification tools, such as aerial maps maintained by the FSA or NRCS, and we question the practicality of *requiring* certifiers to verify this information. We'd like thoughtful guidance regarding *when* this historical assessment would be needed. Always? When we have indicators that an ecosystem has been converted? We're willing to learn how to use new tools, but we recognize what is being suggested here is not part of the current certifier toolbox.

The addition of organic system plan (OSP) questions to gather information about the farm from the farmer is the same method we use to gather information about lands that have been

transitioned to organic production. We gather field history information along with the adequate seed and input use records, but we stop short of verifying with the FSA that certain crops were indeed grown on a specific farm. We enable farmers to attest that they have not applied prohibited inputs *for 36 months* to the fields requested for certification and we do not necessarily contact the local input dealers in the area to verify the farmer has not bought prohibited inputs from them. We work with a system of documented trust. Our general feeling is that we should use a similar balance of review and attestation to verify no conversion of native ecosystems. We would ask the OSP questions, and only if there are reasons for concerns or known risks would we likely do more verification of information from additional resources. Assessment of historic maps and other information would be reserved for operations we have reason to believe *have* converted lands in the past 10 years.

We also recognize that this rule introduces another land conversion period to the standards. Certifiers will need to track lands for 10 years from conversion to agricultural land prior to organic production.

In closing, we again want to emphasize that both incentives and disincentives are important. We continue to want to see emphasis on new incentives or alternatives to conversion, such as promoting and removing barriers to organic transition, as we've described in prior comments on this topic. Our ultimate goal is not only to prevent loss of lands with important habitats, but also to encourage more organic production in general, especially as a replacement to conventional agriculture.

Thank you for your work on this important issue.

Respectfully submitted,

The MOSA Certification Team