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National Organic Standards Board
USDA–AMS–NOP
1400 Independence Ave., SW.,
Room 2642-S., Mail Stop 0268
Washington, DC 20250–0268

Submitted via Regulations.gov.

RE: Docket # *AMS-NOP-19-0095*

Materials Subcommittee – NOSB Research Priorities 2020 (Discussion Document)

Dear NOSB members:

Thank you for the opportunity to provide comments on the Materials Subcommittee's Discussion Document on NOSB Research Priorities 2020. MOSA certifies approximately 2,155 organic operations throughout the United States, including approximately 825 livestock operations, 1,890 crop operations, and 315 handling operations. We're confident that all of our stakeholders are invested in developing better, more informed organic systems. We recognize the extreme importance of sound research toward improving our industry and movement.

We've offered comments on research priorities on a few occasions. We are always in support of organic research initiatives. Again, this list for 2020 points toward exciting and necessary continuous improvements. Further, we appreciate the call toward integrated research considering the whole farm system with interplay of agroecology, the environment beyond the farm's boundaries, native biodiversity, and agricultural plants and animals.

All of the priorities are worthy. However, we also recognize that research dollars and capacity are limited, so, below, we've listed topics that seem most urgent or productive for our work in particular and for the organic movement/industry as a whole. And we've offered brief italicised comments on most of these. It's not lost on us that in many areas we see lists of wants and needs and can't get to them all. Examples include desired working groups with other certifiers, improvements and efficiencies within our own certification agency, and many societal needs for health, ecology, fairness and care. There's something to be said for, "you can't always get what you want, but if you try sometimes, you get what you need!"

Livestock - *MOSA is a top US certifier of livestock operations.*
2. Prevention and management of parasites, examining breeds, geographical differences,

alternative treatments, and pasture species. *Some perspective on parasite issues is found in our comment on Fenbendazole, also submitted for this Spring NOSB meeting.*

Crops

1. Examination of decomposition rates, the effects of residues on soil biology, and the factors that affect the breakdown of biodegradable bio-based mulch film. *This is important for us to finally be able to see a reduction in overall plastic mulch usage.*
2. Conduct whole farm ecosystem service assessments to determine the economic, social, and environmental impact of farming systems choices. *We've found some inspirational, progressive and global thinking in the IFOAM Organics International concept paper "Organic 3.0." This research priority would seem to relate to a couple of features of Organic 3.0, including a culture of innovation, and true value and cost accounting.*
3. Organic no-till practices for diverse climates, crops, and soil types. *In the face of climate change, we need to build resilience into our organic systems, and farmers need new methods of gaining some control over their systems as climate variables increase. We'd like to see some research funds be directed to farmers that are trialing new methods.*
4. Develop cover cropping practices that come closer to meeting the annual fertility demands of commonly grown organic crops. *Beyond simply improving production systems, this is also urgent, considering climate change. We have limited time to impact carbon cycles, and sound research is needed to ensure needed outcomes.*
5. Development of systems-based plant disease management strategies are needed to address existing and emerging plant disease threats. *Organic is systems-based and seeks to limit external inputs.*
7. Strategies for the prevention, management, and control of invasive insects and weeds. *Invasives are a threat to otherwise balanced systems.*
10. Impartial evaluation of microbial inoculants, soil conditioners, and other amendments is needed as there is little objective evidence upon which to assess their contribution to soil health. *Soil health is a must and is also marketable, and producers need impartial evaluation to be able to decide which products truly bring desired soil health results.*
12. Elucidate practices that reduce greenhouse gas emissions and that contribute to farming systems resilience in the face of climate change. *We know that organic is a solution toward climate change, which otherwise threatens food security. We have precious short time to pinpoint specific strategies that are most effective.*

Coexistence with GE and Organic Crops *We have offered many public comments on various GE and coexistence issues. We clearly need to learn more, and we believe research findings will help to support fairness in addressing coexistence issues. All of these are important to our stakeholders.*

1. Outcome of genetically engineered (GMO/GE) material in organic compost.
2. Evaluation of public germplasm collections of at-risk crops for the presence of GE traits, and ways to mitigate small amounts of unwanted genetic material in breeding lines.
3. Develop then implement methods of assessing the genetic integrity of crops at risk in order to quantify the current state of the organic and conventionally produced non-GMO seed.
4. Techniques for preventing adventitious presence of GE material in organic crops, and evaluation

of the effectiveness of current prevention strategies.
5. Testing for fraud by developing and implementing new technologies and practices. *We find this to be particularly interesting, from our perspective of oversight and enforcement.*

General
1. Examination of the factors influencing access to organically produced foods. *This also reminds us of a feature of IFOAM's Organic 3.0, empowerment from farm to the final consumer.*
2. Production and yield barriers to transitioning to organic production to help growers successfully complete the transition. *MOSA's vision is a "thriving organic world." Part of getting there is making it easier for conventional producers to be able to transition to organic.*

Thank you for your forward thinking on these research needs, and for helping to set priorities as organic systems continue to improve.

Respectfully submitted,

The MOSA Certification Team