



September 30, 2021

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National Organic Standards Board
USDA-AMS-NOP
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Submitted via [Regulations.gov](https://www.regulations.gov).

RE: Docket #AMS-NOP-21-0038

NOSB Compliance, Accreditation, & Certification Subcommittee Proposal: Letter to Secretary re: Climate Change initiatives

Dear NOSB Members:

Thank you for the opportunity to provide comments on the Proposed Letter to the Secretary regarding Climate Change initiatives. MOSA certifies approximately 2,050 organic operations throughout the United States. Our organizational Vision is “a thriving organic world.” MOSA’s organizational Values include Relationships and Optimism. Related to Relationships, our values statements include: We value human connections and ethical interactions; We are dedicated to supporting transformational change in our food and farming systems, and; We are committed to social justice, fairness, and democracy through fostering inclusiveness and valuing diversity. With Optimism, we believe that Organic offers viable solutions to urgent global challenges, and a thriving organic world must have balance: socio-economic justice, ecological sustainability, and the interdependent well-being of individuals, communities, and ecosystems. Climate change is an underpinning of all these concerns.

We support the direction of the proposed letter to the Secretary, and appreciate that it stresses the importance of organic systems in climate change discussion. We also are wholly supportive of USDA engaging agriculture as a tool for mitigating climate change.

We have some comments on the letter in specific and the topic in general.

For clarity, the acronym GHG should be spelled out (“greenhouse gas”) before the acronym is used.

The letter says, “...when paired with good organic farming practices, an organic farm emits fewer GHGs.” This is true, but for organic to really be regenerative and be part of a climate crisis solution - not just less destructive than conventional agriculture - then the organic community must emphasize and learn more about the science behind “good organic practices.” Some certified organic farms certainly have good intentions, but are not fully regenerative.

The letter cites the experience of farmers on the NOSB achieving yields equivalent to those realized on conventional farms. That experience is valid, but relatively anecdotal. It’s good that this is coupled with cited research (from Muller, Skinner, Squalli and Adamkiewicz, et al.)

Regarding the challenges in definitively linking organic farms’ higher soil organic matter to increased carbon sequestration, we also strongly encourage additional research on that subject. Related, we’d appreciate valid, practical, quantitative measures for helping to assess soil health.

Thank you for pointing out that the Organic Foods Production Act codifies regenerative agriculture through its soil health requirements. Soil health is similarly required under the “maintain or improve” language at National Organic Standards sections 205.200 and .203. We value our process-based standards and recognize that data alone should not drive our certification systems. We caution against mandated quantitative thresholds for certification. However, good, truly regenerative organic practices must be based on good science, with practical measurement tools. Our review of organic producers’ compliance with these standards requirements mixes a look at periodic soil testing with a qualitative and practices-based assessment. Research and data would help us better be able to educate toward best organic practices and also help with enforcement of the “maintain or improve” requirements.

Research and more emphasis on good organic practices can help our label rightfully claim the popular regenerative terminology. “Regenerative agriculture” is currently causing market confusion. It’s being co-opted, including greenwashing and regenerative claims being used for practices that are in fact degenerative. Organic should embrace regenerative agriculture as its own and research and measures will help us to enforce that organic is truly regenerative, not just less degenerative.

We also encourage prioritization of transition-to-organic market development, and removing barriers to transition. The proposed letter notes a number of helpful considerations including education and technical assistance, leveraging existing USDA programs to support CSAF (smallholder financing) strategies, and transition payments. We appreciate your noting that all organic farmers need equal access to federal incentives on the same scale and scope as those available to non-organic farmers.

On the same theme of finances and accessibility, the letter could additionally stress the importance of organic certification cost share programs. With improved enforcement and increasing requirements, certification is becoming more expensive. The cost and burden of certification needs mitigation so that organic remains accessible to all types of operations.

We appreciate the letter’s strong call for research in general. We affirm the importance of the specific research initiatives noted in the letter, and we also support the climate and environment related subjects among the 2021 Research Priorities, such as conducting whole farm ecosystem service assessments, organic no till practices, cover cropping practices, understanding the effects of on-farm biodiversity, assessing production and yield barriers to transitioning to organic production, and of course, elucidating practices that reduce GHG emissions and that contribute to farming systems resilience in the face of climate change.

While we support increased research to better understand the organic vs. conventional yield gap, we’ll additionally comment that, beyond yields, there are climate and environment-benefitting aspects that also should be accounted for when measuring the value of organic systems. Although lesser organic yields need not be a given, they are offset by true value and cost accounting considerations including soil health, environmental impacts, health impacts, and quality of life. True value and cost accounting is a key feature of [IFOAM’s Organic 3.0](https://www.ifoam.bio/sites/default/files/2020-05/Organic3.0_v.2_web.pdf) (https://www.ifoam.bio/sites/default/files/2020-05/Organic3.0_v.2_web.pdf), an internationally-supported guiding concept paper that calls for institutional and strategic reforms and actions to implement what the next phase of organic can and should be. The Organic 3.0 document says, “It needs to be economically viable for farmers, processors and traders to do the right thing and for consumers to make better choices. If the positive and negative externalities are not reflected in the price then inevitably the marketplace becomes distorted and the consumer is unable to comprehend the true value and make appropriate choices. It is thus key to more fairly account for the costs and benefits to the environment, biodiversity, human health, society and culture of any production system and farming method.”

In closing, we are encouraged by the climate focus of the USDA. And, the US must lead toward mitigation and solutions and be a conscientious global neighbor. As also noted by [IFOAM Organics - International](https://www.ifoam.bio/why-organic) (https://www.ifoam.bio/why-organic), “the recent [Intergovernmental Panel on Climate Change \(IPCC\) report](https://www.ipcc.ch/srcl/) (https://www.ipcc.ch/srcl/) showed that our food systems are estimated to cause up to 29% of global anthropogenic greenhouse gas emissions. Chemical fertilizers used to grow food are responsible for the majority of nitrous oxide released into the atmosphere as a result of human activity. There are estimates that agriculture is directly responsible for 80% of deforestation worldwide. Farmers often bear the consequences of our unsustainable economies and lifestyles. They are some of the world's poorest and most food insecure people, most severely hit by climate change. We need to create policies for food and agriculture taking all common concerns of humankind into consideration.”

Thank you for your emphasis on the importance of organic production as our world tries to work together on our existential climate change crisis.

Respectfully submitted,

The MOSA Certification Team