April 30, 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

Dear Associate Administrator Barnes,

The National Sustainable Agriculture Coalition, the National Organic Coalition, and the Organic Farming Research Foundation welcome the opportunity to submit comments on the 2019 Organic Survey that the National Agricultural Statistics Service (NASS) is reinstating, as published in the Federal Register, Vol. 84, No. 40. Together, our organizations have valued our partnership with NASS in improving our understanding of trends in organic agriculture through more robust data collection, and provide joint recommendations on behalf of the organic farmers and other organic stakeholders we represent.

The National Sustainable Agriculture Coalition (NSAC) is a national alliance of over 47 family farm, food, rural, and conservation organizations[1] that together take common positions on federal agriculture and food policies to advance sustainable agriculture. NSAC's research policy work focuses on the development, funding, and implementation of USDA and other federal research, education, extension, and integrated programs that advance sustainable food and agricultural systems – including organic production systems. Over a third of our Coalition members are actively working on issues facing organic agriculture, including organic research and data collection; education and outreach; and providing technical assistance with organic certification.

The National Organic Coalition (NOC) is a national alliance of organizations working to provide a "Washington voice" for farmers, ranchers, environmentalists, consumers and industry members involved in organic agriculture. NOC seeks to advance organic food and agriculture and ensure a united voice for organic integrity, which means strong, enforceable, and continuously improved standards to maximize the multiple health, environmental, and economic benefits that organic agriculture provides. The coalition works to assure that policies are fair, equitable, and encourage diversity of participation and access.

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 fosters 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.

Since 2008, NASS's Organic Survey 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 doing so in the future. Our recommendations that follow are based on the structure and format of the 2014 Organic Survey, and 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.

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.

Sincerely,

Juli Obudzinski
National Sustainable Agriculture Coalition

Nichelle Harriott
National Sustainable Agriculture Coalition

Michael Stein
Organic Farming Research Foundation

Steve Etka
National Organic Coalition

[1]Agriculture and Land-Based Training Association Salinas, CA; Alternative Energy Resources Organization Helena, MT; CCOF Santa Cruz, CA; California FarmLink Santa Cruz, CA; C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture) Hereford, TX; Catholic Rural Life St Paul, MN; Center for Rural Affairs Lyons, NE; Clagett Farm/Chesapeake Bay Foundation Upper Marlboro, MD; Community Alliance with Family Farmers Davis, CA; Community Involved in Sustaining Agriculture South Deerfield, MA; Dakota Rural Action Brookings, SD; Delta Land and Community, Inc. Almyra, AR; Ecological Farming Association Soquel, CA; Farmer-Veteran Coalition Davis, CA; Florida Organic Growers Gainesville, FL; FoodCorps, OR; GrassWorks New Holstein, WI; Hmong National

Development, Inc. St Paul, MN and Washington, DC; Illinois Stewardship Alliance Springfield, IL; Institute for Agriculture and Trade Policy Minneapolis, MN; Interfaith Sustainable Food Collaborative Sebastopol, CA; Iowa Natural Heritage Foundation Des Moines, IA; Izaak Walton League of America St. Paul, MN/Gaithersburg, MD; Kansas Rural Center Topeka, KS; The Kerr Center for Sustainable Agriculture Poteau, OK; Land Stewardship Project Minneapolis, MN; MAFO St Cloud, MN; Michael Fields Agricultural Institute East Troy, WI; Michigan Food & Farming Systems – MIFFS East Lansing, MI; Michigan Organic Food and Farm Alliance Lansing, MI; Midwest Organic and Sustainable Education Service Spring Valley, WI; Missouri Coalition for the Environment St. Louis, MO; Montana Organic Association Eureka, MT; The National Center for Appropriate Technology Butte, MT; National Center for Frontier Communities Silver City, NM; National Hmong American Farmers Fresno, CA; Nebraska Sustainable Agriculture Society Ceresco, NE; Northeast Organic Dairy Producers Alliance Deerfield, MA; Northern Plains Sustainable Agriculture Society LaMoure, ND; Northwest Center for Alternatives to Pesticides Eugene, OR; Ohio Ecological Food & Farm Association Columbus, OH; Oregon Tilth Corvallis, OR; Organic Farming Research Foundation Santa Cruz, CA; Organic Seed Alliance Port Townsend, WA; Rural Advancement Foundation International – USA Pittsboro, NC; Union of Concerned Scientists Food and Environment Program Cambridge, MA; Virginia Association for Biological Farming Lexington, VA; Wild Farm Alliance Watsonville, CA; Women, Food, and Agriculture Network Ames, IA.

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 some progress to remove barriers and increase access to crop insurance for organic producers. The development and expansion of organic price elections for 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. This section asked producers to document their most recent losses including the year, organic crop, quantity affected, unit of measure and the economic loss.

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 real risk faced by organic farmers and has potentially devastating consequences – including loss of access to a thriving organic market. 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. It is important, therefore, to account for 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. 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 would 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, which collects 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. We would also urge NASS to consider including additional questions that collect information on what actions were taken to prevent contamination (i.e. delayed planting, planting border rows, isolation) and the costs associated with preventative measures.

Further, understanding the losses - both in frequency and magnitude - will help inform efforts to protect organic farmers, their fields and potential redress whether economic or policy or both. GMO contamination is an increasing problem and organic farmers are faced with higher production costs to avoid cross-pollination from GMO crops. A 2014 survey conducted on the GMO contamination within organic agriculture reports up to a third of respondents must deal with GMO presence in their organic hay and grain.[1] Retaining this question, with the suggested amendments, will help us 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?*

[1] Organic Farmers Pay the Price for GMO Contamination. 2014. Issue Brief. Food and Water Watch and the Organic Farmers' Agency for Relationship Marketing

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 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, agricultural inputs (i.e. fertilizers, soil amendments), livestock feed, repairs and supplies, among others. This data is extremely 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 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 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 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 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 seeds 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)

The organic community regularly uses this information to analyze long-term profitability and future trends of the organic sector as input costs changes.

5. Disaggregate data collected on use of green and animal manure (Section 13)

Section 13 of the 2014 Organic Survey inquires about production practices for organic agricultural production and includes a question on use of "green or animal manures." We urge that these be broken out into two separate categories as they represent two distinct sources of nutrients with markedly different impacts on the soil and cropping system. Since green manure is simply a cover crop tilled into the soil, it's more appropriate that "cover crops and green manures" be shown as one practice, and "animal manures" as a separate practice.

We suggest NASS separate green manure from animal manure as asked in *h*, and create a new field as follows:

> *In 2019, did this operation use any of the following practices for organic agricultural production:*
>
> …
>
> *h. Cover crops (harvested or grazed) or green manures (incorporated into soil)*
>
> *i. Animal manures*

6. 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, which commodities are intended for cultivation or production on the transitioned acreage, and possible barriers to transition. 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 therefore recommend that NASS expand Section 16 to include a question on plans for future transition of additional acres, what crops/animal will be grown/raised on future acres transitioned, and any barriers that exist to transitioning additional land into organic production (i.e. limited availability of land, rising costs of farmland, lack of secure tenure on farmland, etc).

We would also urge Question 4 to be further broken down to ask about specific commodities grown or raised on transitional acres (rather than generic "cropland"). We would also urge NASS to explore ways to collect further granularity on the current use of the land intended for transition into organic production (i.e. in current agricultural production (conventional), not currently in agricultural production, currently in forest, pasture, etc). 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 On Additional Questions

1. Organic Certification

Operation information requested by the Organic Survey does not currently record the year the operation was first certified organic. We suggest including this as part of Section 1, Operation Information. Understanding how long farmers have been certified and how long farmland has been farmed organically would provide important historical data on how long land is staying in organic production and provide a picture of the growth of the organic.

2. Usage and Availability of Certified Organic Seeds

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 the farmer's region. How often farmers need to rely on non-organic seed and for which crops is useful information for researchers, extension, and policymakers in evaluating whether farmers have sufficient access to organic inputs, and where future research priorities for organic plant breeding should focus (i.e. specific crops, regions).

Therefore, we strongly urge NASS to collect this information by adding an additional question on certified organic seed production:

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

Organic Crop	*Certified Organic Seed (Percent acreage planted)*	*Non-certified Organic Seed (Percent acreage planted)*
CROP1		
CROP2		
CROP3		

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.

2. Other issues to consider for the 2019 Organic Survey

Food Safety – The Food Safety Modernization Act (FSMA) impacts many farming operations, including those growing organically. Expansive new food safety regulations promulgated by the Food and Drug Administration (FDA) will be taking effect in 2019, and food safety inspections will soon become a routine part of farming. However, some operations will be exempt from FSMA inspections. To help establish baseline information for future consideration of how the new FSMA

rules are impacting organic farmers, we suggest NASS include a question asking respondents whether their operation is exempt from meeting new FSMA produce food safety regulations, and if not, any associated costs of compliance as well as any changes they have been required to make to their Organic Systems Plan. Suggested language for a new section on Food Safety might be:

> *In 2019, the new FDA rules for Produce Safety go into effect, including on-farm inspections. Some farms are exempt from the Produce Safety Rule or most of the Produce Safety Rule based on their annual sales, crops grown, crop use, and market venues.*
>
> *1. Do you anticipate having to meet additional produce safety requirements under the new FDA food safety regulations? If yes, continue. If no, skip to Section xxx.*
>
> *2. Please provide an estimate of anticipated annual costs of compliance, including new infrastructure, materials, and labor.*
>
> *3. Did you make any changes to your Organic Systems Plan in order to be in compliance with new FDA regulations? If so, please specify any changes.*

Additional questions could collect information on expenses required for the farm to be in compliance with new FSMA rules and regulations (testing, certification, training, etc).

Estimated percentage of land left uncultivated for on-farm biodiversity – There is little data currently available regarding how much farmland is currently left uncultivated for pollinator habitat or habitat for beneficial organisms that help protect crops from pests, even though it is widely recognized by ecologists as being very important for supplying these ecosystem services to farmers. In addition to 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. While we encourage NASS to include this question on the Organic Survey, it would be more valuable to be able to compare on-farm biodiversity on organic farms to conventional farms, in order to make some accurate comparisons and analysis of the benefits of different farming systems. Suggested survey language:

> *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.*