



Organic Farmers Agency for Relationship Marketing (OFARM)  
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April 5, 2023

National Organic Standards Board  
USDA – AMS  
1400 Independence Ave, SW  
Washington, DC 20250

Docket AMS-NOP-22-0071

To: National Organic Standards Board,

We appreciate the opportunity to submit comments to NOSB.

The mission of the Organic Farmers Agency for Relationship Marketing (OFARM) is to coordinate efforts of producer marketing groups to benefit and sustain organic producers with a strong emphasis on opportunities to educate and engage producers in the benefits of cooperative marketing. OFARM continues to be proactive on issues, which either directly or indirectly impact our member producers.

We want to commend the well drafted resolution which serves to reinforce Organic as Climate Smart. We strongly support its passage

We want to encourage the National Organic Standards Board (NOSB) to continue its diligence to keep the organic program strong and to advocate for the needs of organic operations.

Without lengthy dialog we support the following positions.

- OFARM continues to stand firm on the disallowance of GMOs and its variants, such as gene editing.
- OFARM opposes soil-less hydroponics and continues to ask how the basic principles of organic production in healthy soils and soil building practices can continue to be ignored.
- While we still note some shortcomings, OFARM supports the implementation and enforcement of an Organic Livestock and Poultry Standards rule which is long overdue. It carries wide organic stakeholder support. Our concern is that it still falls short of truly curbing the continuation of huge CAFO type operations which hold a significant market advantage over family farm operations that fully embrace basic organic production

principles. It is sad to see that over and above labels continue to need consideration to meet consumer expectations.

- While we want to commend the NOP for several more recent actions by finally bringing the OOL rule to fruition and the diligence to work through the many aspects of the, now released, SOE Rule, it still points to the problem of the time involved in moving such important rulemaking forward in a more-timely manner. The NOSB needs to keep the pressure on to move forward to address the still existing backlog of recommendations which need timely consideration.
- Of primary concern for the organic grain producers OFARM represents, is the implementation of the SOE. One of the main aspects of concern is the lack of clarity in the expectation of import certificates being filed prior to shipment arrivals. The current requirements, as we understand them, still fall short in that incoming shipments may still enter the domestic supply chain without full disclosure of its impending arrival. This matter begs a NOSB resolution to tighten the timing requirements for import certifications.

As the conversations continue among our membership and leadership it becomes apparent that there are legitimate concerns about the general direction the organic industry is going.

On the production side of the equation, we see the majority of the egg and broiler production relegated to huge operations which fail to embrace the basic principles of true outdoor access. As has been noted, the newly drafted OLPS, while well intended, is little more than a band aid approach to reign in major infractions to basic organic principles. These questionable production units will adjust to some of the imposed rule changes but largely will continue with business as usual while they maintain their market advantage over the smaller family farm operations.

Dairy production continues to follow the same mode of operation, with the majority of milk being produced in CAFO units, where it becomes blatantly obvious that basic organic production practices are being obviously, largely ignored by certifiers. Their continued curve of growth truly points to a continued departure from basic organic principles. The unfair market advantage they enjoy continues to drive legitimate family farm dairies out of business.

The huge appetite for grain inputs for these operations leads to looking for world wide sources of supply which has led to imported feedstuffs from parts of the world where fraudulent activity appears to be the norm. While we commend the attempt to reign in fraud through the far-reaching elements of the SOE it again points to the band aid approach to fix a truly broken system.

Vegetable production is becoming largely the same scenario with soil-less production being allowed when the OFPA is clear that organic principles of production are to be based on building and maintain healthy soils. This infraction needs to be addressed and stopped.

These are basic issue that should command attention in NOSB discussion.

On the commerce side of the equation, we see the same large corporations that dominate the non-organic food market continuing to march forward on inroads into the organic market at every level.

It is very possible that some of the early pioneers in organic that raised concerns about getting the government involved may have been right on pointing to an old adage that “If we ask the government to do it for us, we may find that it will eventually do it to us”.

We have certainly come to the point where there is legitimate concern on the part of consumers having faith in the USDA Organic seal.

The effectiveness of the NOSB in proposing and expecting meaning full changes has also been seriously eroded. The continuing backlog of proposals which are not being addressed, and many time ignored, point to a broken system. It is far past high time to engage in a serious sit-down between NOSB and NOP to re-establish a true working relationship. Even that having a positive out-come is becoming highly questionable, considering the influence of corporate involvement in the appointment process.

It truly saddens our clientele of producers that we must report that the majority of time the NOSB spends in meeting is relegated to review of, many times, highly questionable inputs in organic practice while their basic function is to be the proper interpretation of the basic principles of the OFPA.

Many commenters will address individual items of concern and that is also good and well, but it does appear that this level of dialog takes away from the possibility to get back to the basics. Doing so would place some of these elemental concerns in a category of non-issues and allow for more time to address the basic principles which would serve to embrace the paradigm shift the organic community intended in the first place.

Common sense should prevail in the discussions.

We thank you for the opportunity to offer our observations.

Sincerely,

*Oren Holle*

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