

Marie Burcham, JD
Director of Domestic Policy
The Cornucopia Institute

Good morning. I am Marie Burcham, the Director of Domestic Policy for The Cornucopia Institute. I am also an attorney with a background in animal and environmental law.

We stand by the fact that the organic label isn't just about substitution of inputs. The rules and regulations make that clear. But the industry has moved away from a holistic practice. We urge the NOSB to continue the hard work required to uphold organic integrity.

Organic is about fostering soil health, having livestock outdoors on land managed to improve, not degrade, its quality. It's about supporting native ecosystems and improving local communities, all while providing food that is both nutritious and safe to families.

When the Organic Livestock and Poultry Practices rule was discarded, it was clear to many stakeholders that the NOP was rubber stamping industrial poultry production. **Confinement-based poultry businesses are breaking the current organic rules because, on a basic level, every bird does not have access to the outdoors.** The loss of the OLPP signified an absolute breakdown of public process—the majority of commenters and **public input was in favor of *some kind of regulation*.**

You've also heard from family-scale dairies. **Cornucopia hears from farmers and our members all the time echoing these concerns.** They are losing their farms—and their homes—due to perceived loopholes in the rules. When farms like these are lost, many consumers will lose their trust in the organic label.

If consumers lose that trust, all organic farms—big and small—will be at risk. The difference is that industrial scale producers can go back to the conventional marketplace. That will not be an option for most family-scale farms.

There is a theme among these problems: a lack of consistency in how the rules are applied. For many in the industry, there now appear to be TWO ORGANIC LABELS.

We urge the NOSB to aggressively push these issues with the NOP. We need clarification about the three-year land transition period. **It's disturbing that what is apparently clear language in the soil fertility and nutrient standard is being muddied.** We need Accredited Certifiers to enforce current and future rules consistently. If we need new rules to provide that consistency, then we need them now.

We urge the NOSB to act to the extent they have authority. Your work and recommendations represent the voice of the organic stakeholders for the USDA. If your efforts are fine tuned to support REAL organic farmers, you can help save the organic label.

Thank you for your time and hard work on all these issues.