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First, I want to thank you very much for your time and service to this Board.

For the past two years, I have worked as a farm policy analyst for the Cornucopia Institute. My primary responsibility has been to work on import fraud.

It's hard to believe the time that has passed, but at my first NOSB meeting, I stood before the Board in Tucson with a petition in hand asking that the NOP take immediate action.

The action requested was that the NOP address, on an expedited basis, the regulatory loopholes that have allowed fraudulently labeled organic grain imports to cross U.S. borders.

Two years later, I still get calls every week from organic grain farmers asking what progress is being made and what is being done.

They tell me about their struggles to keep going in the face of unfair competition from grain imports with highly questionable organic status. They just want a level playing field.

As the Board is aware, the crisis has gone on for several years, not just two.

I tell these farmers, good things have happened thanks to the efforts of many people in this room.

The 2018 Farm Bill provisions are positive developments.

But we cannot rest here. Additional work is needed and it has to start now.

First, I encourage the Board to advise the NOP to take all steps necessary to attain stop-sale authority.

Stop-sale authority would allow the NOP to prevent fraudulent organics from entering the stream of commerce – this is fundamental to enforcement. **Ultimately, one cannot effectively enforce what one cannot stop when no other agency exercises that role.**

Stop-sale authority is a powerful deterrent to bad actors trying to infiltrate the U.S. organic market.

The NOP should work with Congress to address the due process concerns and any statutory hurdles that currently limit this authority.

Second, when a foreign certifier has been sanctioned by regulators in other countries, this ought to immediately trigger an investigation of the certifier, any of the implicated operations it certifies until verification of organic authenticity can be established.

As stated in my written comments, earlier this month the EU limited the authority of a major certifier to certify products in several high-risk countries. The reason: fraud.

Where is that product headed now and where have those operations turned for certification?

Third, weak penalties for regulatory violations are unfortunately useless.

As we know, fraud is about money, and as long as bad actors know cheating is cheap, the conduct will continue. Penalties need to threaten to put a fraudulent operation out of business, otherwise the rewards of cheating outweigh the risk of getting caught.

I strongly urge the NOP to aggressively impose fines under current regulations, but also to work with Congress for authority to impose fines that leave bad actors calculating that fraud is just too costly to consider.

Again, thank you very much for your time and efforts on this very important issue.