



C O R N U C O P I A  
I N S T I T U T E

## **Testimony Presented at the Fall 2019 Meeting of the National Organic Standards Board**

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My name is Marie Burcham and I am an attorney and the Director of Domestic Policy for The Cornucopia Institute.

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 holistic practice. We urge the NOSB to continue to work toward organic rules and regulations that support economic justice for family farmers, livestock animal welfare, and environmental stewardship.

Families rely on the organic label to provide transparency in how their food was produced. Where some individuals choose organic because they support its principles, others use the organic label out of necessity due to health issues. The organic label promises consistency in livestock treatment, sustainability, and lower toxic inputs for these consumers.

Right now many certified organic producers are not meeting that promise.

For example, When the Organic Livestock and Poultry Production rule was discarded it was clear that the NOP was rubber stamping industrial poultry production. These confinement-based poultry businesses are breaking the current organic rules because, on a basic level, every bird does not have access to the outdoors.

We urge the NOSB to continue to push these issues and be the mouthpiece of the public. Under the organic rules and regulations poultry often receive poor treatment. Despite the withdrawal of the OLPP, a rulemaking in this area is still appropriate and needed in this industry. The NOSB can also do their part to push for better livestock policy that **emphasizes time spent outdoors for every individual animal**.

Cornucopia also wants to see fair competition under the organic seal. That means there must be uniform application of OFPA and the organic rules and regulations.

Right now there is significant inconsistency among the Accredited Certifiers that makes this fair competition impossible. One of the glaring instances of this inconsistency is how hydroponics has been approached. There are no rules regarding organic hydroponics specifically. But even without rules some certifiers disregarded, or continue to disregard, transition times.

We look forward to hearing the NOP's clarification on the issue of hydroponic transition times. But the problem of inconsistent application of the organic rules still needs to be cured overall.

Family farmers—the lifeblood of the organic industry—are losing their farms in record numbers. This is particularly true of family-scale dairies and others in the organic livestock industry.

We urge the NOSB to act on these issues to the extent they can. For example, we support the 2010 recommendation and the requirements to foster soil fertility in both livestock and crop production. Where there is inconsistent application of organic rules, guidance or rulemakings may be necessary.

Cornucopia has also submitted written comments that we hope the NOSB will consider moving forward.

We are looking forward to seeing the products of your hard work in the coming years.

Thank you for your time and dedication to this public process.