

Public Comment, 2020 Spring NOSB meeting  
April 23, 2020

My name is Marie Burcham and I am an attorney and the Director of Domestic Policy for The Cornucopia Institute. I have a couple general comments in addition to Cornucopia's written comments I would like to share today.

**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.

To that end, it's essential that the NOP acts on NOSB recommendations.

Of particular concern is the lack of action on the NOSB's 2018 formal recommendation to Eliminate the Incentive to Convert Native Ecosystems to Organic Production.<sup>1</sup>

Sensitive ecosystems are still at risk. This issue is essential to organic production and label integrity. We cannot say we are dedicated to environmental stewardship and then allow farms to destroy rare habitat in the name of organic production.

OFPA gives the NOP broad authority to enact regulation to further the aims of the statute. The formal recommendation from the NOSB in this particular case does exactly that, since organic production is explicitly required to support biodiversity and prevent environmental harm.

Cornucopia urges the NOSB to continue to push these issues with the NOP.

We agree with other commenters that the rulemaking on **Origin of Livestock** needs to be moved forward. **The systemic problems of livestock origin and pasture compliance have not evaporated just because we are facing a global pandemic. In fact, now is the perfect time to get vital regulation enacted to give some clarity and assurance to farmers who are facing an uncertain marketplace.**

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.

We urge the NOSB to act on these issues to the extent they can. Rulemaking and guidance are the USDA's contribution to continuous improvement.

Cornucopia was happy to see the broad scope of the research priorities suggested by the NOSB. We suggest it is paramount that research be done on regenerative agriculture and its relation to climate change issues. Shifting global agriculture away from exploitative and input-heavy practices may be an important piece of solving climate issues, and the organic label has an important role to play in that shift.

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<sup>1</sup> <https://www.ams.usda.gov/sites/default/files/media/CACSNativeEcosystems.pdf>

We'd also like to see research into how to bring racial and economic justice to the forefront of the organic label. Right now many families do not have access to the land or ability to farm; still others do not have access to healthful organic food.

The organic marketplace shouldn't be just a "niche" market reserved for some members of society. The label's goals stand in contrast to the harms perpetuated by conventional food systems and should be the norm—not an outlier. Our industry, like our society, needs to examine how we can do better. This is what it means to be dedicated to "continuous improvement."

Thank you for your time and dedication to this public process—and welcome to the new Board members!

*[Aside: Other issues that have languished include the NOSB's 2010 recommendation concerning soil fertility in both livestock and crop production.<sup>2</sup>]*

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<sup>2</sup><https://www.ams.usda.gov/sites/default/files/media/NOP%20Final%20Rec%20Production%20Standards%20for%20Terrestrial%20Plants.pdf>