

**Public Comment, 2021 Spring NOSB meeting
April 22, 2021**

Good afternoon members of the NOSB and NOP; my name is Marie Burcham. I am the Policy Director for The Cornucopia Institute.

We were pleased to see research priorities touching on climate change concerns, including identifying the most effective practices to reduce greenhouse gas emissions and build resilience. The industry can and should do more to support climate-smart practices within the label.

While reduction in fossil fuel use is of primary concern to the climate crisis, it will be impossible to meet the Paris Agreement's goals without major reductions in emissions from food and agriculture as well.¹ Agriculture produces approximately 10% of total greenhouse gas emissions.

Organic producers who already emphasize their stewardship of the land hold the key to making all agriculture, whether organic or not, more environmentally resilient. In fact, organic systems produce about two-thirds less emissions than conventional, almost entirely due to the avoidance of synthetic fertilizers and other chemicals.

However, there are some internal conflicts in the organic standards and application of those standards that conflict with climate-health goals. The lack of regulatory progress to keep up with the changing marketplace is of serious concern.

You've already heard Wild Farm Alliance speak to the issue of Native Ecosystems. We support their comments in full. The NOSB's recommendation on this issue has languished since 2018.

The organic label cannot credibly speak about sustainability, protection of biodiversity and climate resilience while still allowing the destruction of native ecosystems in the name of organic farming. Native ecosystems provide services for the public good that we cannot afford to lose.

The Wild Farm Alliance and the NOSB have already done the hard work in creating comprehensive guidance and toolkit—it's time to push for this regulation on all levels.

The stated purpose of OFPA is to *establish national standards* that will then be used to govern the marketing of organic products, to assure consumers that organic products meet a *consistent standard*, and to facilitate commerce in organic food.

Ultimately, OFPA gives the NOP broad authority to enact regulation to further the aims of the statute.

Regulatory improvement is expected and often necessary to meet OFPA's edict. Most of the regulatory change recommended by the NOSB is needed to cure unintended loopholes or existing problems in the current regulations.

For example, the Origin of Livestock rulemaking would cure a systemic in organic dairy. The Organic Livestock and Poultry Practices rule was also intended, in part, to make the livestock standards

¹ <https://science.sciencemag.org/content/370/6517/705.abstract>

more consistent. We do not have these fixes in place yet, despite the majority of stakeholders calling for them again and again.

This is the task of the NOP and the NOSB. We recognize the immense challenges of developing comprehensive and enforceable regulations. We support greater funding to the NOP to create and enforce the law. Part of this work can and should include better uniformity among the accredited certifiers, as they are a driver of consistency within the label.

Consumers choose organic food for many reasons. Consumer understanding of our food systems continues to increase. New science on cropping systems and livestock management comes to light every day. If the organic label does not maintain its integrity and respond to new and more nuanced understanding of organic practices, consumer faith will be lost.

The Cornucopia Institute supports authentic organic farmers—and we need our regulators to support them too.