

Good afternoon members of the NOSB and NOP. My name is Burcham, and I am an attorney and the Policy Director for The Cornucopia Institute. I have a general comment for the NOSB today.

To better support the organic marketplace, we need to improve integrity and transparency by committing to **continuous improvement**. Without continuous improvement in the standards, enforcement, and organic research, OFPA's purpose cannot be met. Further, organic integrity requires that loopholes, inconsistencies, and vacuums within the organic standards be addressed continuously as well.

Cornucopia connects with organic consumers on a regular basis. We hear several themes voiced again and again by dedicated organic buyers, including:

- Concerns that the organic seal does not mean what consumers believe it does, despite these beliefs often being formed by the USDA's own marketing materials.
- Concerns that industrialized farming methods that are linked to poor animal welfare, environmental harm, and human health risks are being used in organic farming.
- Confusion about how widely varying production practices can share the same label.
- Frustration due to misinformation being peddled by anti-organic propaganda which serves to undermine the actual benefits of organic agriculture.

Cornucopia hears from organic farmers as well, and their concerns echo those of dedicated organic consumers. Authentic organic farmers face difficult challenges competing against corporations and conventional brands using the organic label for a quick buck.

We encourage you to provide better opportunities for farmers and dedicated organic consumers to be involved in this public process. Without both farmers and consumers, there is no label.

NOSB is vital to the organic program's continuous improvement. Your recommendations can help to address the serious threats to the organic label.

We ask you to address **inconsistencies**, **regulatory vacuums**, and **new and evolving** research in organic agriculture. This should include:

- Addressing organic transition. A certifier survey on policies for three-year transition periods **showed serious inconsistencies**. These inconsistencies encourage bad actors to cheat the system, pushing the industry as a whole away from the goal of continuous improvement.
- Tackling the issue of hydroponics and container production. As of right now this production method has no standards; certifiers are left to pick up the pieces.
- Approaching the National List with the goal of moving substances off the list, so that the industry is continuously improving toward environmental resilience.
- Addressing regulatory vacuums by updating old recommendations where needed and discussing problems within the existing standards. [Ex: swine, native ecosystems.]

A growing body of scientific research also shows that farming systems designed and managed according to underlying organic principles **can meet** the food needs of our society, while also addressing our serious environmental and social issues. Despite the USDA's insistence that "organic is just a marketing label," it is in fact an alternative to the extractive and harmful practices that abound in conventional agriculture.

The stakes are high: we all need to embody continuous improvement to succeed and grow.