

*Good afternoon. My name is Anne Ross. I am an Organic Investigator for the Cornucopia Institute and member of the policy team. I'd like to thank the NOSB members for their time here today.*

I'll briefly address an issue you've already heard a good bit about today.

We need immediate action to ensure that imported organic grain is legitimate. Organic grain farmers continue to tell us that they are experiencing declining prices, forcing many to consider whether they can continue farming. The farmers we talk to are resilient, adaptive, and innovative. They are accustomed to unpredictability, including market fluctuations – but the price pressures they are facing now are getting far too heavy, and again, we must question, “why?”

Again we question, whether the playing field is truly fair given the volume of imported grain from countries whose yield data just doesn't make sense – this is the same question we've been asking for years now and yet again we are calling for mandatory testing of imports.

For example, how can Nigeria, Argentina, and Ghana average hundreds of bushels of organic soybeans per acre, when the data shows U.S. growers typically average significantly less?

SOE is supposed to improve supply chain traceability, but we need verification that the traceability requirements are working right now. We cannot stand by silently while the market is flooded with grain that has not been thoroughly vetted. That's why Cornucopia supports legislative action, including those measures advocated by OFA and other groups. We have long called for and continue to support required testing of *every bulk shipment* of organic feedstuffs arriving at U.S. ports. Imports entering the U.S. by truck and train should also be tested.

If SOE is true to an intent to adopt a risk-based approach, testing of every shipment of imported organic feedstuffs should be mandatory. The numbers continue to tell the story – if a single ship of cracked corn represents millions of dollars, it's easy to see why verification is critical given the market impact

We know that the majority of organic grain imports are arriving from countries where corruption is common and infrastructure is poor. Logic demands we confirm the legitimacy of these imports where a simple mass/balance analysis just doesn't add up. Consumers deserve to know that food bearing the organic label is, in fact, organic. U.S. farmers need the level playing field they deserve.

Thank you for your time today.