

Formal Recommendation
From: The National Organic Standards Board (NOSB)
To: The National Organic Program (NOP)

Date: May 1, 2024

Subject: Opportunities in Organic - Improving Support for Organic Transition

NOSB Chair: Kyla Smith

The NOSB hereby recommends to the NOP the following:

Rulemaking Action:

Guidance Statement:

Other: X

Statement of the Recommendation:

As USDA invests more resources in support for organic transition, including the \$300 million Organic Transition Initiative (OTI) that USDA announced in 2022, USDA should maximize the benefits of these public investments and ensure that organic is relevant to a more diverse population – as an environmental stewardship strategy, a career path, and a source of sustenance. To these ends, all USDA agencies, including the National Organic Program (NOP), Natural Resources Conservation Service (NRCS), Transportation and Marketing (T&M), Farm Service Agency (FSA), Risk Management Agency (RMA), Economic Research Service (ERS), and Food and Nutrition Service (FNS), should work closely together to provide flexible and coordinated support to organic and transitioning producers, including taking actions in four main areas identified by organic stakeholders:

1. Support economically viable opportunities in organic.

- a. Ensure strong integration of all elements of USDA's Organic Transition Initiative (OTI) and other federal and state resources to support organic, so opportunities and deadlines are communicated to all agencies and partners involved with OTI. For example, participants in the Transition to Organic Partnerships Program (TOPP) should receive and disseminate information about market grant and conservation program deadlines and the NOP Climate-Smart Agriculture Crosswalk. (NOP, NRCS, T&M, USDA)
- b. Identify and address barriers to organic transition, including assisting farmers with long-term access to land and capital. (NOP, ERS, USDA)
- c. Build consumer demand for organic by educating the public about what organic is and why it matters. Campaigns run through check-off programs (e.g., Got Milk?) are the type of promotion that organic producers would like to see. (NOP, USDA)
- d. Create stable markets for organic through public procurement (i.e. government food purchasing). (FNS, USDA)

2. Reduce costs of certification by offsetting costs that organic producers bear.

- a. Ensure the Organic Certification Cost-Share Program is administered consistently and predictably. (FSA)
- b. Pay producers for participation in training programs (both presenters/mentors and participants/mentees). (NOP)

- c. Ensure the benefits of organic are acknowledged and compensated in programs that pay producers for public benefits they provide, like building healthy soil and ecosystem services. (NRCS)
 - d. Provide culturally appropriate, inclusive, and supportive certification services; adapt certification culture to the people and communities certifiers serve. (NOP)
- 3. Invest in relationship and trust building.**
- a. Continue to work through organizations that producers already trust. (NOP, USDA)
 - b. Provide funding early in processes to both resource organizations with demonstrated experience and capacity and build capacity at additional organizations. (NOP)
 - c. Build organic-relevant capacity at all USDA agencies, and particularly those that directly interface with producers. (NRCS, FSA, RMA, USDA)
- 4. Diversify and expand the organic community.**
- a. Resource organizations that serve producers of color for a multi-year timeframe, including to support activities that are not directed specifically toward organic certification. (NOP, USDA)
 - b. Actively educate farming communities on opportunities in and benefits of organic agriculture. (NOP, NRCS, USDA)
 - c. Target outreach to organizations that work on succession planning, to leverage organic as a way to keep land in agriculture. (USDA)

Rationale Supporting Recommendation:

Organic agriculture offers significant climate, health, and economic benefits, for producers and consumers. Organic market growth has been strong for decades, with domestic organic food sales surpassing [\\$60 billion in 2022](#). But still [less than 1%](#) of U.S. agricultural land is managed organically and the U.S. remains a net importer of organic products.

One of the three primary purposes of the Organic Foods Production Act of 1990 (OFPA) is “to assure consumers that organically produced products meet a consistent standard,” and the NOSB is charged with advising USDA on implementing this purpose.¹ Organic producers do not believe that consumers are receiving that assurance, and consumer confidence is essential to organic market growth.

Producers who may be interested in transitioning to organic come from diverse backgrounds and career paths – from farmworkers seeking to become organic farm owners to seasoned producers considering a different approach to farming. This diversity means that the most successful approaches to overcoming barriers may vary significantly. In addition, many beginning producers and producers of color face heightened challenges related to language, cultural competency, and discrimination that must be addressed. Increasing diversity among organic producers and handlers could contribute to a stronger sense of inclusion and opportunities in organic.

USDA’s unprecedented \$300 million Organic Transition Initiative (OTI) has three main elements designed to address many of these barriers: funding to build a transition support network, with organic certifiers in the lead; an organic practice standard for conservation programs and a crop

¹ 7 U.S.C. §§ 6501(2), 6518(a).

insurance discount; and market development grants. Each of these elements is currently in process.

As more programs to support organic transition become available, USDA and the NOSB have a shared interest in ensuring that these resources are used effectively and efficiently to expand organic production and markets in the long-term. In addition, there is a need for deeper understanding of how improvements in diversity, equity, and inclusion in the organic sector could expand the relevance of organic – to producers and consumers alike.

The NOSB gathered stakeholder input and feedback during the Fall 2023 NOSB meeting to advise the Secretary on continuing to improve implementation of OFPA, including support for organic transition, and ensure consumer access to and confidence in the organic label.

This recommendation is organized into four categories, with the following rationales:

1. Support economically viable opportunities in organic.

- a. Organic producers do not believe that consumers are receiving assurance about consistent standards, and consumer confidence is essential to organic market growth.
- b. Several cost and pricing issues impact the potential for organic growth. Where the primary consumer base cannot afford to pay more for food, producers may have less incentive to pursue organic certification, but can still enhance their operations and reduce costs with support and technical assistance with organic management systems.
- c. Lack of access to land and capital remain significant barriers to organic transition because unstable land tenure prevents farmers from making the long-term investments necessary for successful organic farming systems; historic and continuing racial discrimination exacerbate these barriers for farmers of color.
- d. Existing organic producers also have concerns about increased organic supply depressing prices – although organic consumers could stand to benefit in that scenario, including consumers who face perceived or actual cost barriers to buying organic.
- e. Public investments are a tool for bridging cost/price gaps, and stronger integration and commitments to organic at USDA and other agencies could help ensure that organic producers maximize use of existing resources and funding sources.
- f. Retailers may also contribute to pricing challenges for both producers and consumers; USDA and other federal and state agencies could play a stronger role in ensuring that organic producers have access to a fair and competitive marketplace.

2. Reduce costs of certification by offsetting costs that organic producers bear.

- a. The costs of certification remain a significant barrier to organic certification, especially for producers serving low-income communities and communities of color where price premiums for organic are less prevalent.
- b. Implementation of new management systems may be costly.
- c. Immigrant farmers and farmers with limited experience navigating regulatory systems and/or or distrust of government agencies must invest significant time and resources to translate and comprehend certification materials and processes.
- d. Organic producers are not receiving a fair share of public investments in agriculture, so they are competing in a skewed marketplace.

3. Invest in relationship and trust building.

- a. Support for transition requires a significant time investment from support systems – organizations, farmer mentors, etc. Producers are more likely to successfully achieve certification after participating in a training session or receiving one-on-one technical assistance.
- b. Money is time: a significant success of the TOPP program to date is the use of funding to pay staff and farmer mentors to be available and to proactively conduct outreach – building capacity and extending the reach of support organizations. However, conversely, the structure of cooperative agreements with the NOP has resulted in lack of adequate funding for early stages of project work for TOPP partners, which has limited the type of hiring and program growth that is needed to maximize success. Organizations supporting organic transition need multi-year support to build and maintain capacity.
- c. Organic producers cannot always access relevant advice – programmatic or agronomic – at their local USDA office.

4. Diversify and expand the organic community.

- a. The first year of TOPP focused on low-hanging fruit – stitching together existing capacity, encouraging more systematic and proactive outreach, and helping producers who are already interested in organic farming achieve certification.
- b. To achieve transformational change in agriculture and reach organic's full potential, transition resources also need to reach producers and supply chains that are not already aware of opportunities in organic.
- c. Many farmers hold misconceptions about organic farming and certification. Education and farmer outreach help farmers make fact-based decisions and spread accurate information through word of mouth.
- d. Relationship and trust-building take time and require reciprocity.

NOSB Vote:

Motion to accept the proposal on Opportunities in Organic – Improving Support for Organic Transition

Motion by: Allison Johnson

Seconded by: Jerry D'Amore

Yes: 14 No: 0 Abstain: 0 Recuse: 0 Absent: 1

Motion Passed

National Organic Standards Board
Certification, Accreditation, Compliance Subcommittee (CACS)
Improving Support for Organic Transition Proposal
February 13, 2024

Introduction:

The NOSB has gathered information about stakeholder experiences with organic transition programs generally, and USDA’s Organic Transition Initiative (OTI) specifically, to inform this proposal to maximize the benefits of public investments in organic transition and ensure that organic is relevant to a more diverse population – as an environmental stewardship strategy, a career path, and a source of sustenance.

Background:

Organic agriculture offers significant climate, health, and economic benefits, for producers and consumers. Organic market growth has been strong for decades, with domestic organic food sales surpassing [\\$60 billion in 2022](#). But still [less than 1%](#) of U.S. agricultural land is managed organically and the U.S. remains a net importer of organic products.

Numerous barriers may deter producers from pursuing organic certification, including – but certainly not limited to: certification costs, challenges with the process, and proximity to certification services and inspection capacity; limited access to land and capital; insufficient regionally-relevant technical assistance for organic management systems; lack of economic opportunities and benefits, including lack of access to regional markets and organic supply chain infrastructure; agricultural training that does not present organic as an option; and inadequate access to organic mentorship and peer networks.

Producers who may be interested in transitioning to organic come from diverse backgrounds and career paths – from farmworkers seeking to become organic farm owners to seasoned producers considering a different approach to farming. This diversity means that the most successful approaches to overcoming barriers may vary significantly. In addition, many beginning producers and producers of color face heightened challenges related to language, cultural competency, and discrimination that must be addressed. Increasing diversity among organic producers and handlers could contribute to a stronger sense of inclusion and opportunities in organic.

More programs to support organic transition are becoming available, and USDA and the NOSB have a shared interest in ensuring that these resources are used effectively and efficiently to expand organic production and markets in the long-term. In addition, there is a need for deeper understanding of how improvements in diversity, equity, and inclusion in the organic sector could expand the relevance of organic – to producers and consumers alike.

In 2022, USDA announced the unprecedented \$300 million Organic Transition Initiative (OTI), with three main elements designed to address many of these barriers: funding to build a transition support network, with organic certifiers in the lead; an organic practice standard for conservation programs and a crop insurance discount; and market development grants. Each of these elements is currently in process.

Relevant areas in the Regulation or OFPA:

One of the three primary purposes of the Organic Foods Production Act of 1990 (OFPA) is “to assure consumers that organically produced products meet a consistent standard,” and the NOSB is charged with advising USDA on implementing this purpose.¹ Organic producers do not believe that consumers

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are receiving that assurance, and consumer confidence is essential to organic market growth. The NOSB gathered stakeholder input and feedback during the Fall 2023 NOSB meeting to advise the Secretary on continuing to improve implementation of OFPA and ensure consumer access to and confidence in the organic label.

Discussion:

The proposal is organized into four categories that stood out in public comments, with the following rationales:

1. Support economically viable opportunities in organic.

- a. Organic producers do not believe that consumers are receiving assurance about consistent standards, and consumer confidence is essential to organic market growth.
- b. Several cost and pricing issues impact the potential for organic growth. Where the primary consumer base cannot afford to pay more for food, producers may have less incentive to pursue organic certification, but can still enhance their operations and reduce costs with support and technical assistance with organic management systems.
- c. Lack of access to land and capital remain significant barriers to organic transition because unstable land tenure prevents farmers from making the long-term investments necessary for successful organic farming systems; historic and continuing racial discrimination exacerbate these barriers for farmers of color.
- d. Existing organic producers also have concerns about increased organic supply depressing prices – although organic consumers could stand to benefit in that scenario, including consumers who face perceived or actual cost barriers to buying organic.
- e. Public investments are a tool for bridging cost/price gaps, and stronger integration and commitments to organic at USDA and other agencies could help ensure that organic producers maximize use of existing resources and funding sources.
- f. Retailers may also contribute to pricing challenges for both producers and consumers; USDA and other federal and state agencies could play a stronger role in ensuring that organic producers have access to a fair and competitive marketplace.

2. Reduce costs of certification by offsetting costs that organic producers bear.

- a. The costs of certification remain a significant barrier to organic certification, especially for producers serving low-income communities and communities of color where price premiums for organic are less prevalent.
- b. Implementation of new management systems may be costly.
- c. Immigrant farmers and farmers with limited experience navigating regulatory systems and/or distrust of government agencies must invest significant time and resources to translate and comprehend certification materials and processes.
- d. Organic producers are not receiving a fair share of public investments in agriculture, so they are competing in a skewed marketplace.

3. Invest in relationship and trust building.

- a. Support for transition requires a significant time investment from support systems – organizations, farmer mentors, etc. Producers are more likely to successfully achieve certification after participating in a training session or receiving one-on-one technical assistance.
- b. Money is time: a significant success of the TOPP program to date is the use of funding to pay staff and farmer mentors to be available and to proactively conduct outreach – building capacity and extending the reach of support organizations. However, conversely, the structure of cooperative agreements with the NOP has resulted in lack of adequate funding

for early stages of project work for TOPP partners, which has limited the type of hiring and program growth that is needed to maximize success. Organizations supporting organic transition need multi-year support to build and maintain capacity.

- c. Organic producers cannot always access relevant advice – programmatic or agronomic – at their local USDA office.

4. Diversify and expand the organic community.

- a. The first year of TOPP has focused on low-hanging fruit – stitching together existing capacity, encouraging more systematic and proactive outreach, and helping producers who are already interested in organic farming achieve certification.
- b. To achieve transformational change in agriculture and reach organic’s full potential, transition resources also need to reach producers and supply chains that are not already aware of opportunities in organic.
- c. Many farmers hold misconceptions about organic farming and certification. Education and farmer outreach help farmers make fact-based decisions and spread accurate information through word of mouth.
- d. Relationship and trust-building take time and require reciprocity.

Public Comment:

Public comments on the Fall 2023 discussion document called for more resources to support organic transition, provided that those resources are coupled with market development efforts. One-on-one mentorship and relationship-based support stood out as an essential theme – farmers are more likely to survive and thrive after the transition to organic when they receive support early in the process and from trusted sources. Commenters also noted the need for reaching producers who are not adequately represented in the organic sector yet.

Summary:

USDA agencies, including the National Organic Program (NOP), Natural Resources Conservation Service (NRCS), Transportation and Marketing (T&M), Farm Service Agency (FSA), Risk Management Agency (RMA), Economic Research Service (ERS), and Food and Nutrition Service (FNS), should work closely together to provide flexible and coordinated support to organic and transitioning producers, including taking actions in the four main areas identified by organic stakeholders:

1. Support economically viable opportunities in organic.

- a. Ensure strong integration of all elements of USDA’s Organic Transition Initiative (OTI) and other federal and state resources to support organic, so opportunities and deadlines are communicated to all agencies and partners involved with OTI. For example, participants in the Transition to Organic Partnerships Program (TOPP) should receive and disseminate information about market grant and conservation program deadlines and the NOP Climate-Smart Agriculture Crosswalk. (NOP, NRCS, T&M, USDA)
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 - c. Ensure the benefits of organic are acknowledged and compensated in programs that pay producers for public benefits they provide, like building healthy soil and ecosystem services. (NRCS)
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Subcommittee Vote:

Motion to accept the proposal on Improving Support for Organic Transition

Motion by: Allison Johnson

Seconded by: Jerry D'Amore

Yes: 7 No: 0 Abstain: 0 Recuse: 0 Absent: 1