



July 20, 2015  
Sent electronically

Organic Promotion, Research, and Information Order;  
Room 3071-S, STOP 0201;  
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Thank you for the opportunity to provide additional ideas for a federal organic research and promotion program, which I am submitting on behalf of the Ohio Ecological Food and Farm Association (OEFFA).

OEFFA is a not-for-profit organization representing more than 3,500 farmers, gardeners, consumers, retailers, educators, and researchers who strive to build a healthy food system that brings prosperity to family farmers, meets the growing consumer demand for local food, creates economic opportunities for rural communities, and safeguards the environment. OEFFA also operates one of the country's oldest USDA-accredited organic certification agencies, and currently certifies more than 850 farms and processing operations in 14 states.

To understand our members' impression of and opinion about an organic check-off program, twice in the past year (August 2014 and June 2015) OEFFA surveyed the farms and businesses it certifies; the results serve as a foundation of the input presented in this document.

OEFFA would like to outline areas that we feel would strengthen a proposed organic check-off, and encourages AMS to incorporate the recommendations that follow.

## **Voting**

It is very troubling to us that approximately two-thirds of all organic certificate holders will be automatically excluded from this program unless they explicitly "opt in" to it. Structuring the program in this way flies in the face of the stated intent of the research and promotion program to benefit the organic industry across its full spectrum. Further, that approximately 70% of the certificate holders are farmers, this means a key stakeholder group will not be part

of the program that purports to benefit them. In our June 2015 survey, less than 7% of respondents indicated that they would, or probably would, volunteer to be assessed so they could vote in the referendum and have a say in the check-off program.

**RECOMMENDATION: All organic certificate holders are included in an organic research and promotion program.**

One advantage the organic industry has, compared with other commodity groups, is contact information for every certificate holder. There is no reason to make certificate holders request a ballot to vote in the referendum, as is proposed in the GRO Organic proposal. Further, administratively it would be much more efficient to mail out ballots to all eligible voters, rather than field requests and send out ballots.

**RECOMMENDATION: All organic certificate holders will be mailed a ballot, along with a stamped envelope with AMS as the return address.**

Our surveys found that many certificate holders still are not aware of, or in some cases, do not understand, the proposed program. Information needs to be sent out so voters can make an informed choice. To ensure impartiality, the USDA needs to be the gatekeeper of this information.

**RECOMMENDATION: Included in the AMS ballot mailing will be information about the proposed organic check-off program, and supporting and opposing position summaries.**

## **Board representation**

To ensure true farmer representation on this board, it is imperative that any certified organic farmer who is part of an organic research and promotion program administered by AMS have the opportunity to be considered for the proposed regional producer seats, not just those that have gross organic sales above \$250,000. In fact, in certain regions it may be difficult to find farmers who meet that criterion.

**RECOMMENDATION: Any farmer that is part of the organic research and promotion program is eligible to serve in the regional producer seats.**

If 100% mandatory participation is not adopted, farmers that voluntarily opt into the program would be eligible; if 100% mandatory participation is adopted, all farmers would be eligible for these seats.

To ensure the proposed organic check-off board reflects the broader organic industry, the board composition should reflect the actual make-up of organic certificate holders, and ideally reflect the diversity of the organic industry (size/income, types of production, types of processing and distribution, and so on).

**RECOMMENDATION: Increase farmer representation to 70% of the board, and include language that encourages the Secretary of Agriculture to work toward selecting a board that reflects the diversity of the industry.**

## Research

A strong selling point with most organic farmers for a check-off program is having additional research dollars available for organic research. It is essential, therefore, to have the definition of research for this proposed program include, and even emphasize, organic agricultural production research and farmer profitability.

### **RECOMMENDATION: Change the definition of research to read as follows:**

*Research means any type of investigation, study, evaluation or analysis (including related education, extension, and outreach activities) designed to improve organic production systems and practices, increase farm profitability and productivity, expand organic farming opportunities, and enhance the quality of life for farm families and their communities; enhance plant and animal breeding and varietal development for organic systems and improve the availability of other production inputs; optimize natural resource conservation, biodiversity, and environmental outcomes of organic agriculture; identify and explore solutions to economic, marketing, trade, and policy constraints on the expansion of organic agriculture; advance organic farm and food safety objectives; enhance or increase the consumption, image, desirability, use, marketability, or production of organic products; or to do studies on nutrition, market data, processing, environmental and human health benefits, quality of organic products, including research directed to organic product characteristics and product development, including new uses of existing organic products, new organic products or improved technology in the production, processing and packaging of organic products.*

## Funding

The GRO Organic proposal identified the need to increase U.S. organic production as a key justification to establish an organic research and promotion program, as well as the need to develop effective pest management tools. Yet only 25% of collected assessments will be dedicated to research, which OEFFA estimates to be approximately \$6.25 million a year. Given the breadth of U.S. organic production (corn, wheat, soybeans, dairy, eggs, poultry, beef, pork, vegetables, fruit—just to name a few), this amount is insufficient, given the task at hand and the demand for research funds from land grant universities and other institutions across the country. Further, research needs that directly benefit farmers will be competing for these funds with research needs from other sectors of the industry.

### **RECOMMENDATION: At least 50% of the assessments collected will go toward research.**

The GRO Organic proposal allows the board to accept outside funding. To avoid undue influences, or any appearance thereof, such a mechanism should not be in place.

### **RECOMMENDATION: No outside donations will be accepted by this proposed organic research and promotion program.**

## **The need for an industry-wide independent survey**

The results of the survey distributed by OEFFA do not uphold the claims in the GRO proposal of wide industry support for it, and other organizations like ours are hearing a similar lack of support from their members. Only a minority of our respondents (certified organic certificate holders) support a mandatory organic check-off program. Specifically, in our August 2014 survey, 41% of the respondents said it was “a terrible idea”; 35% said it “could be a good idea, but had reservations”; 8% said it was “a great idea,” and 12% had no opinion (4% did not answer the question). The June 2015 survey found 28% of the respondents overall supported the GRO Organic program; 36% did not support the program, and 35% had no opinion (1% did not answer this question). All questions asking about specific aspects of the proposed program drew “I don’t know” as a response from 35%-41% of the respondents.

If there is going to be federal research and promotion program for organics, it is important to get it right, right from the start. To propose a program that removes the heart of the organic industry does not make sense. The above recommendations are necessary elements that must be included in USDA’s proposal. Further, the USDA may first want to survey (a representative sample of) organic certificate holders and confirm there is support across the board, prior to moving forward with a proposal.

Again, thank you for the opportunity to offer input. We would welcome the opportunity to continue this discussion with AMS.

Sincerely,

A handwritten signature in black ink that reads "Renee Hunt". The signature is written in a cursive, flowing style.

Renee Hunt  
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