



BEYOND PESTICIDES

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March 19, 2018

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Re. CACS: Eliminating Incentives to Convert Native Lands to Organic Production

These comments to the National Organic Standards Board (NOSB) on its Spring 2018 agenda are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

As mentioned by the Certification, Accreditation and Compliance Subcommittee (CACS) in the Proposal on Eliminating the Incentive to Convert Native Ecosystems to Organic Production, the Organic Foods Production Act (OFPA) and implementing regulations and guidance issued by the National Organic Program (NOP) contain several provisions to increase biodiversity on organic farms. Biodiversity is essential to organic farming, but all farming inherently reduces biodiversity from natural ecosystems. These natural ecosystems contain ecological communities that are diverse and resilient because of their coevolution over millennia.

In this context, despite efforts of organic farmers to build and protect biodiversity, it is unlikely that the organic farm will achieve the same level of biodiversity and ecological resilience as the original ecosystem. On the other hand, the conversion of conventional, chemical-intensive agriculture to organic agriculture provides huge benefits to biodiversity through both the absence of toxic inputs and positive measures to increase biodiversity in soil-based systems that are required by OFPA or its regulations. Therefore, Beyond Pesticides supports efforts by the NOSB to eliminate incentives to convert high value native land to organic production, as well as to increase incentives to convert chemical-intensive farmland to organic production.

To this end, we support the motion proposed by the subcommittee, as proposed:

MOTION TO APPROVE THIS PROPOSAL

Add the following definition to §205.2

Native Ecosystem: Native ecosystems can be recognized in the field as retaining both dominant and characteristic plant species as described by established classifications of natural and semi natural vegetation. These will tend to be on lands that have not been previously cultivated, cleared, drained or otherwise irrevocably altered. However, they could include areas that had been substantially altered over 50-100 years ago, but have since recovered expected plant species composition and structure.

Add this language to §205.200 General– addition is in bold

§205.200 The producer or handler of a production or handling operation intending to sell, label, or represent agricultural products as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must comply with the applicable provisions of this subpart. Production practices implemented in accordance with this subpart must maintain or improve the natural resources of the operation, including soil and water quality.

(a) A site supporting a native ecosystem cannot be certified for organic production as provided for under this regulation for a period of 10 years from the date of conversion.

This proposal has gone through several rounds of public discussion, followed by improvements. We are happy to see a version that will protect native lands. We have some concerns with aspects of the text pertaining to the suggested questions for certifiers to ask in the certification process. To provide clarification for certifiers and farmers, we strongly urge that the details of how certifiers build this standard into organic system plans be worked out in NOP guidance in collaboration with the Wild Farm Alliance and experienced certifiers.

Conclusion

We support the CACS proposal and thank the NOSB and all who have worked hard to bring it to fruition.

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors