



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

March 27, 2023

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

Docket # AMS-NOP-22-0071

Re. CACS Crop Insurance Discussion Document

These comments to the National Organic Standards Board (NOSB) on its Spring 2023 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 eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

It is clear that crop insurance does not work for organic farmers. Many organic farms are highly diversified—indeed diversity is a goal and principle of organic farming. Organic farmers adjust practices like timing in ways that may be viewed as “poor farming practices” among chemical intensive farmers and the system that supports them. Many organic farmers sell directly to consumers, so payments tied to wholesale prices fail to reimburse their losses. These facts make organic farming a poor fit for current crop insurance programs. As stated by the CACS,

Organic farmers manage their risks through improving soil organic matter, rotating crops, and diversifying their operations (Hanson et al., 2004). Improving soil health is viewed as on-farm risk management by many organic producers (Snyder et al., 2022). Another form of risk is price risk related to market access and other market factors. Some producers, especially those who raise specialty crops, manage their market risk by

creating a CSA, or by marketing their production to multiple outlets (Snyder et al., 2022).

The safety net provided by crop insurance could be beneficial, particularly in this age of climate uncertainty. Beyond Pesticides supports the following proposals from the Ohio Ecological Food and Farming Association:

Proposals to Make Crop Insurance Work for **Everyone**

Make Crop Insurance **Fair**

- Each operation should receive one subsidy and no more. The Farm Bill should include a strong “actively engaged in farming rule” to set this limit. No double-dipping.
- Crop insurance should only apply to land that is suitable to be farmed. The Farm Bill should prohibit crop insurance premium subsidies on unsuitable land.
- The Farm Bill can better support beginning farmers with less costly crop insurance policies, continue to support the majority of farmers with policies valued between \$10k-\$100,000 and reduce the rate of support for the largest farms who hold policies totaling more than \$100,000. See reverse side for more detail on this “Bracket” proposal.

Make Crop Insurance **Functional**

- Organic producers often plant later than their non-organic counterparts, due to strategic organic systems management. USDA’s Risk Management Agency (RMA) must establish a unique final planting date for certified organic crops in each region *with a non-penalizing grace period* so that organic producers can maintain productivity and organic status.
- Organic producers should use the transition period to develop an organic management system and write their Organic System Plan in conjunction with their application for organic certification. RMA should provide organic insurance to producers transitioning to certified organic status without requiring an Organic Systems Plan.
- A clear, transparent, consistent path for organic transition and crop insurance must be established. As USDA invests \$300 million in organic transition, transitioning operators must be supported through a streamlined farm safety net.
- Create an Enterprise Unit (EU) by Practice Type option for organic status. This would enable operators to group land separately so that each type could be managed and insured appropriately.
- Whole Farm Revenue Protection is intended to serve small and diversified producers but has limited utilization. It must be improved to better support these growers through lower premium costs associated with higher levels of diversity, and true revenue protection for operations already mitigating risk through diverse production systems.

Make Crop Insurance **Informed**

- The National Agriculture Statistics Services (NASS) and RMA should work together to regularly conduct an organic production survey.
- Expand National Resources Conservation Service (NRCS) technical capacity and cooperative agreements to support adoption of soil health plans.
- Require organic literacy within RMA to help employees and agents be informed about organic insurance in order to better serve organic clients and grow the benefits of the organic industry.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a prominent flourish at the end.

Terry Shistar, Ph.D.
Board of Directors