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-23-0026

Re. CACS Crop Insurance Discussion Document

These comments to the National Organic Standards Board (NOSB) on its Fall 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 reduce or 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). Other types of risk are price risk related to market access and other market factors. Some producers, especially those growing specialty crops, manage market risk by creating a CSA or by marketing to multiple outlets (Snyder et al., 2022).

The safety net provided by crop insurance could be beneficial, particularly in this age of climate uncertainty. However, insurance in general, and crop insurance in particular, is an inadequate response to the crises that face us. The insurance industry has recognized this by pulling out of markets—such as insuring homes vulnerable to hurricanes, floods, and fires. These threats—which were once considered rare events—are now routine occurrences. While
people need help in a crisis, what is really needed is an approach that recognizes the causes of the disasters.

We need to go beyond the mindset that environmental disasters like severe storms, drought, fire, and floods are anomalies that we can get past. We can’t insure our way out of these sustained predictable events. While the insurance model helps to address crises, it allows us to ignore the causes.

In the case of agriculture, organic agriculture must be recognized as a public good and encouraged through public funding of an insurance mechanism that not only makes organic farmers whole in the case of a disaster, but also encourages chemical-intensive farmers to abandon the methods that cause the climate, biodiversity, and public health crises in favor of organic methods that reduce the dangers. Instead of subsidizing farming methods and materials that create catastrophes, public policy should underwrite insurance for organic farmers, thus incentivizing more farmers to make the transition to organic. The cost should be borne by the purveyors of fertilizers and pesticides who benefit from a system dependent on their products.

Beyond Pesticides supports the following proposals from the Ohio Ecological Food and Farming Association:

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors