



January 7, 2019

Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave. SW  
Washington, D.C. 20250

CC: NOP Deputy Administrator Jenny Tucker

Dear Undersecretary Ibach:

We the undersigned write to bring your attention to comments made by multiple organizations, accredited certification agencies, and others regarding impacts of energy systems infrastructure on USDA certified organic farms. The public expects and the value of the organic industry is built upon the perception and realization of a system of production that is, to the greatest extent possible, free from synthetic inputs and based on natural capital.

For the past four years, the undersigned have made written (attached) and oral comments to the National Organic Standards Board outlining the extent that energy industry practices result in contaminated inputs to certified organic farms. They also outline multiple ways the National Organic Standards Board (NOSB) and the National Organic Program (NOP) can study and address the issues.

What is clear in examining the breadth of comments, attached here, is that we must act to preserve market confidence in the National Organic Program by providing resources to certifiers in the form of instruction to ensure consistent enforcement of the standards relative to this issue. The common themes identified include:

- Asking the NOSB to study the impacts of energy infrastructure on organic farms by adding this issue to the NOSB work agenda
- Host a panel of experts to provide information and clarification to the NOSB and NOP
- Study the successful implementation of Organic Agriculture Impact Mitigation Plans and its potential for wider use across the country
- Develop a discussion document that lays out one or more potential courses for action and includes guidance or instruction to certifiers leading to a final proposal
- Share this information with the Council on Environmental Quality to consider declaring organic farms as sensitive areas, as well as with the Federal Energy Regulatory Commission for use in the Environmental Impact Analysis process.

The impacts of this industry are being felt in California, Ohio, Illinois, Wisconsin, Pennsylvania, West Virginia, Texas, Oklahoma and Michigan, as well as throughout the country through the distribution process. Data indicates it has or will have an impact on 10-31 percent of U.S. organic farms.

We can provide workable short and long-term strategies for minimizing the effects of this industry on the growth of the organic industry. We acknowledge the complexity of this issue and that it, like GMO contamination, is caused by the incursion of industries outside of organic.

Thank you for giving consideration to this issue and know that we are ready to help in any way possible.

Sincerely,  
Amalie Lipstreu  
Policy Director  
Ohio Ecological Food and Farm Association

Trudy Bialic  
Director, Public Affairs and Quality Standards  
PCC Community Markets

Patty Lovera  
Assistant Director  
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Terry Shistar  
PhD, Science Advisor  
Beyond Pesticides