



April 3, 2020

National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Washington, D.C. 20250-0268

Re: Docket No. AMS-NOP-19-0095

PCC would like to thank the National Organic Program (NOP) and the National Organic Standards Board (NOSB) for the opportunity to provide comments on the NOSB's agenda and the NOP program. We are especially grateful for the NOP's efforts to continue the NOP and NOSB's work under the extraordinary circumstances facing our nation and the world.

I. Introduction

PCC Community Markets is a community-owned, co-operative food market that began as a food-buying club of 15 Seattle families in 1953. Today, we have more than 76,000 active member-owners and 13 stores in seven cities, generating \$312 million in annual sales — making PCC the largest consumer-owned and operated grocer in the United States. We are a triple bottom line organization, advocating for consumers and the community in everything we do.

Organic is an integral part of our product offerings and operations, valued for its benefits to consumer and environmental health. Because of this, PCC has integrated organic into its identity and priorities from our product sourcing to store operations as a certified organic retailer.

PCC has also been an active member of the organic community and in 2018 became a full member of the National Organic Coalition (NOC) and will be a member signatory to its extensive and collaborative comments submitted to the NOSB.

On the majority of the materials and detailed discussion issues outlined in the NOSB's agenda, we refer you to the NOC Comments and concur with the NOC position and recommendations. There are, however, several broader issues PCC would like to address individually and are discussed in the following comments.

II. Supporting the Organic Community and Full Supply Chain

In this time of a global pandemic, the necessity of maintaining regional and independent food sources and supplies has increasingly become a priority as we have seen strains on transportation, trade, and staffing impact more centralized national and global supplies. The ability of a town, city, and county to turn to the diversified specialty crop producers, distributors, and retailers within their local regions (often focusing on organic products) has provided a lifeline on multiple fronts of the food supply chain.

In the Seattle region and for PCC, this has meant being able to call on local organic producers to fill orders left empty by national distributors, enabling farmer market producers to shift supplies to struggling food banks, and calling on organic distributors to potentially provide warehousing space to support consolidated food orders. There have been many more examples and all of them have emphasized the incredible agility and essentiality of the organic supply chain during this global crisis.

Yet in these times there are also significant threats to this critical food supply infrastructure. It is the local, independent organic supply chain, particularly the small and mid-sized specialty producers, that do not have the financial support, staff, or infrastructure to adapt to the severe regulatory and economic shifts occurring at lightning speed.

Whatever can be done to support these essential parts of the organic system must be a top priority. While the main form of this support should be in the fervent advocacy for all organic programs, particular emphasis should be paid to efforts to sustain small and mid-sized producers and ensuring that organic standards often modeled by these producers are applied across the board.

III. Organic Integrity and Consistency

People still care about how their food is grown and whether the way it is grown has a negative impact on the environment and those helping to produce that food. As the economic impacts of the pandemic increase, and given the tremendous pressure retailers are under to ensure food supplies, it is also now more important than ever that we be able to trust that the organic product we are sourcing and providing to our consumers is, in fact, organic and meeting a consistent set of standards.

Issues that highlight the need for consistent and detailed directives in the form of regulations and additional guidance include, finalizing the organic enforcement and fraud prevention rulemaking, developing and promulgating rules concerning hydroponic, container, and greenhouse production methods in line with the NOSB's 2010 and 2016 recommendations, continuing the NOSB's work on evaluation and exclusion of genetically-engineered methods, finalizing animal welfare standards, and fixing gaps in the origin of livestock and pasturing regulations.

Taking action and offering the consistency and clarity that the organic community needs on these important organic standards and regulations will not only ensure the integrity of the label on which we rely, but also assist with the other priorities highlighted in these comments.

IV. Climate, Soil Health & Organic

There is no question it will be a different world in the coming months economically, socially and culturally. What will remain unchanged after the traumatic events of the pandemic, however, are the continuing threats posed by climate change. At the state and national levels, we have seen an exciting movement of initiatives, many already approved by state legislatures, targeting agriculture's role in reducing negative impacts on the climate through improved soil fertility, carbon sequestration, increased biodiversity, reduced carbon inputs, and improved agricultural and pasturing practices. We have also seen the struggle of policy makers to identify organic as the leading framework and existing infrastructure already implementing and achieving many of these goals.

While some of this struggle is due to inaction on the part of the NOP to enact critical NOSB recommendations and enforce the Organic Foods Production Act (OFPA's) clear priorities on soil fertility development and practices, pasturing, and biodiversity, part of the struggle is in not clearly communicating and identifying organic's alignment with the evolving agricultural lexicon and climate change priorities.

To this end we are very supportive of NOC's recommended agenda item, focusing on enforcement of soil building, cover-cropping, crop rotation, and biodiversity practices required in the organic regulations. As a part of this work, the NOSB should identify and make recommendations to strengthen organic practices for climate

mitigation, adaptation, and carbon sequestration—clearly aligning organic practices with the definitions and practices of regenerative and carbon-focused farming.

We want to see organic as the solution it should be in the climate change context.

V. Conclusion

PCC reiterates that for positions on individual proposals, discussion documents, and material review, and elaboration on many of the topics noted in these comments we refer you to the NOC comments and endorse these recommendations.

We also would like to reiterate our gratitude towards the NOSB and the NOP for its willingness to carry on this important work and its continuous efforts to ensure that the organic label remains one of the strongest certifications that consumers and retailers can rely on for verified health and environmental protections.

Sincerely,

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PCC Community Markets