



ORGANIC FARMERS ASSOCIATION

Sponsored by  RODALE INSTITUTE

September 17, 2019

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, D.C. 20250

Dear Secretary Perdue,

The Organic Farmers Association and the undersigned organizations serving the broad organic farming community are united in our concern by the recent comment by Under Secretary Greg Ibach during the House Committee on Agriculture Subcommittee on Biotechnology, Horticulture, and Research hearing on July 17, 2019, where he said,

As the National Organic Standards Board set the rules originally, GMOs are not eligible to be in the organic program. However, we've seen new technology, including gene-editing, that accomplishes things in shorter periods of time than a natural breeding process can. I think there is the opportunity to open the discussion to consider whether it is appropriate for some of these new technologies that include gene-editing to be eligible to be used to enhance organic production and to have drought and disease-resistant varieties, as well as higher-yield varieties available.

The organic community is united that WE DO NOT WANT TO revisit the conversation about genetic engineering in organics, and all forms of genetic engineering should remain excluded methods under the National Organic Program. When the USDA last suggested that genetic engineering be allowed in organic production in 2001, during the drafting of the National Organic Standards, it received 400,000 comments demanding genetic engineering be prohibited under organic certification. Organic farmers are united in their opposition to genetic engineering (including gene-editing) and will hold steadfast in this opposition. Decades of organic farming experience and organic research have proved working with natural materials and cropping systems that encourage biodiversity result in improved soil health and resilient ecosystems—we do not need, nor do we want, genetic engineering for organics. Consumers have also shown they do not want genetically engineered products in the certified organic food system. The exclusion of genetic engineering from the organic food supply has supported consistent growth of certified organic food sales over the past twenty years both for our domestic and export markets.

We, the undersigned, represent and are responsible to organic farmers, organic gardeners, organic processors, and consumers of organic products. We are committed to a national organic label that strives for continual improvement and strong organic integrity. Many of our organizations include founders and leaders who have been certified organic since before the USDA National Organic Program (NOP) was created and many of them helped create the national program and write the national standards. **We strongly oppose any efforts to revisit the issue of any type of genetic engineering in**

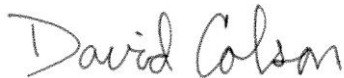
organic certification, and we will work to ensure that all genetic engineering remains an excluded method.

The USDA NOP and the National Organic Standards Board (NOSB) have much more important issues within the organic market to focus their limited capacity and resources on — like organic import and domestic fraud, origin of livestock, pasture rule compliance, updating database technologies, etc. **The Under Secretary's suggestion that we should explore gene-editing, or any other type of genetic engineering, would distract from the core issues the organic market is facing right now.**

To build more tools for organic farmers and prepare farmers and our country for future markets, we encourage the USDA and Under Secretary Ibach to instead focus on agricultural programs that grow food in the soil, encourage healthy soil, support healthy environments, and sequester carbon — these are the foundations of organic farming and they deserve more attention from the USDA.

As a community, we are committed to uphold the values and principles of organic agriculture. Permitting any genetic engineering in organic production undermines the integrity of the USDA certified organic label, and we wholly oppose its consideration by the NOP and NOSB.

Sincerely,



David Colson
President, Organic Farmers Association

Supported by the following Organizations:

Accredited Certifiers Association, Inc.
Agriculture & Land-Based Training Association (ALBA)
Americert International
Baystate Organic Certifiers
Beyond Pesticides
Biodynamic Association
CCOF
Center for Environmental Health
Community Alliance with Family Farmers
Cornucopia Institute
Cuatro Puertas
Ecological Farming Association
ETKO Ecological Farming Control Organization
FairShare CSA Coalition
Farm Aid
Food & Water Watch
Full Belly Farm
Global Organic Alliance, INC
Green America
Greensward Nurseries

Hummingbird Wholesale
Illinois Stewardship Alliance
Indiana Farmers Union
Iowa Organic Association
Lancaster Farm Fresh Cooperative
Land Stewardship Project
LaRocca Vineyards
LSAdderson, Inc.
Maine Organic Farmers and Gardeners Association
Michigan Organic Food and Farm Alliance, Inc.
Midwest Organic and Sustainable Education Services (MOSES)
Midwest Organic Dairy Producers Alliance
MOFGA Certification Services, LLC.
Montana Organic Association
MOSA Certified Organic
National Family Farm Coalition
National Organic Coalition
Natural Food Certifiers Inc
Natural Grocers
Nature's International Certification Services
Nature's Path Foods Inc.
New England Farmers Union
Next 7 Project
NOFA-VT
Northeast Organic Dairy Producers Alliance
Northeast Organic Farming Association of New Hampshire
Northeast Organic Farming Association of New York
Northeast Organic Farming Association, Massachusetts Chapter
Northeast Organic Farming Association-Interstate Council (NOFA-IC)
Northeast Sustainable Agriculture Working Group
Northern Plains Sustainable Agriculture Society
Northwest Center for Alternatives to Pesticides
OCIA Research & Education
Ohio Ecological Food and Farm Association
OneCert, Inc.
Oregon Organic Coalition
Oregon Tilth
Organic Advocacy
Organic Certifiers Inc
Organic Consumers Association
Organic Farmers Agency for Relationship Marketing
Organic Pastures
Organic Seed Alliance
PCC Community Markets
Pennsylvania Certified Organic (PCO)
Pesticide Action Network of North America
Primus Auditing Ops
Provender Alliance

Quality Certification Services
Rodale Institute
Slow Food Western Slope
Southeast African American Farmers Organic Network
Stone Coop Farm
Texas Organic Farmers and Gardeners Association
The Land Connection
Virginia Association for Biological Farming
Wild Farm Alliance
Women, Food and Agriculture Network

CC: Gregory Ibach, Under Secretary for Marketing and Regulatory Programs
Jennifer Tucker, Director, National Organic Program
Honorable Pat Roberts, Chairman, Committee on Agriculture, Nutrition and Forestry, U.S. Senate
Honorable Debbie Stabenow, Ranking Member, Committee on Agriculture, Nutrition and Forestry, U.S. Senate
Honorable Collin Peterson, Chairman, House Committee on Agriculture, U.S. House of Representatives
Honorable Stacey E. Plaskett, Chairwoman, Biotechnology, Horticulture, and Research Subcommittee of the House Committee on Agriculture, U.S. House of Representatives
Honorable Rodney Davis, Member, Biotechnology, Horticulture, and Research Subcommittee of the House Committee on Agriculture, U.S. House of Representatives