



October 1, 2020

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

Re: Docket No. AMS-NOP-20-0041

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 again grateful for the NOP's efforts to carry on the NOP and NOSB's work in spite of the continuing disruption of a global pandemic.

I. Introduction to PCC

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 82,000 active member-owners and 15 stores in seven cities, generating over \$300 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.

Supporting the organic food supply system has always been a priority, because of its benefits to consumer and environmental health. This is why we not only prioritize organic products and advocate for organic food systems at local, state, and national levels, but also voluntarily participate in the organic supply chain as a certified organic retailer.

As a part of our commitment to organic, PCC is a full member of the National Organic Coalition (NOC) and encourage members of the NOSB to review the detailed and collaborative comments submitted on behalf of all NOC members. On most of the topics, agenda items, and recommendations we are in agreement with NOC. PCC does, however, want to offer our individual perspective on a few critical topics and agenda items:

II. Supporting Organic as a Resilient Leader in the Face of COVID-19

As a grocer, we have been the interface between the public and the organic food supply chain throughout the COVID-19 pandemic. While we have experienced our own challenges in this role, we have seen time after time the organic supply chain adapt and respond to the needs of our communities in ways none of us envisioned. As we noted in our fall 2020 comments, the ability of the organic supply chain to demonstrate its resiliency and essentiality in the face of the pandemic has only reinforced our commitment to and pride in being a part of this food system model. This is why it is critical to continue to support the fully organic supply chain through maintaining logistical and fiscal support and look for opportunities to strengthen that support.

A. Cost Share

We understand that the cost share allocation and management systems is complex and not the direct responsibility of the NOP or NOSB, but it is unacceptable during this global crisis when organic farmers have been excluded or marginalized in the support provided to conventional farmers, to then add insult to injury and reduce congressionally-directed cost share allocations to 50%. On a matter of such importance, budgeting errors and communication lapses are not acceptable excuses from any sector of the USDA. Both the NOP and NOSB are the representatives and advocates for the organic food supply system and should utilize your knowledge and expertise to identify both immediate and future solutions to ensure this critical financial support.

B. Origin of Livestock

While the delay on issuing the Origin of Livestock rule precedes the pandemic, the continuing delay of the NOP and USDA on this rulemaking (despite congressional directives and overwhelming organic stakeholder support) is a failed opportunity to support our organic dairy producers during an even more uncertain and stressful time. Now, more than ever we need to strengthen the organic dairy market and ensure its integrity. Do not let the perfect be the enemy of the good. We encourage the NOSB to continue to press for finalization of this rule and to encourage the NOP to accept some potential regulatory uncertainty in order to reduce the significant economic uncertainty facing our organic dairy farmers.

C. Additional Rules & Guidance; NOSB Input and Recommendations

The need for consistent and supportive organic standards in the form of regulations and additional guidance does not stop with the Origin of Livestock rule. Across the board, NOP must take steps to implement NOSB recommendations on areas of increasing uncertainty and division, including hydroponic, container, and greenhouse production methods, continuing the NOSB's work on evaluation and exclusion of genetically engineered methods, and finalizing animal welfare standards. The Organic Foods Production Act (OFPA) provided an invaluable resource in the form of the NOSB and it is one that the NOP has increasingly limited and ignored. Utilizing this NOSB resource and taking action to offer the consistency and clarity that the organic community needs on these and other important organic standards will ensure the integrity of the organic label during these uncertain times and for the future.

III. Fish Oil Annotation

Because of PCC's close connection with its community in the Puget Sound, we are a co-op with a passionate commitment to aquatic and marine conservation issues. It is through some of our most recent work to develop a rigorous, place-based [sourcing standard for Chinook salmon](#) that we have gained a significant understanding of the complexities of fishery management and the many interests they must balance from ensuring the survival of threatened species to supporting the indigenous cultures, livelihoods and food systems that depend on the harvest of these valuable resources. It is with this background that we firmly support the initiative of the NOSB to limit unnecessary stressors and impacts on the increasingly strained marine ecosystem and limit organic fish oil sources to those from fish waste or invasive species.

We recommend, however, review of the inclusion of “bycatch” within this allowance. While there are some categories of bycatch in certain fisheries that could potentially fit within the intention of the annotation, there are many species and fisheries (mainly those with less oversight and management) where economic incentives on bycatch may cause a negative incentive.

IV. Marine Macroalgae

We would like to commend the detailed and thoughtful review that the NOSB has conducted on the issue of harvesting marine macroalgae. PCC supports the inclusion of the harvesting parameters annotation for crop fertility inputs as a significant step forward in the development of consistent and strong standards for organic for all marine materials. As we have noted in previous comments, whether our consumers are buying seaweed snacks or eating food produced from inputs and ingredients derived from seaweed and algae materials, there is an expectation that these products have not caused detrimental impacts to the broader ecosystems wherever those impacts can be controlled. We would encourage the NOP and NOSB to continue its work on this important issue and develop more comprehensive guidance and/or regulations concerning marine material harvesting of all kinds.

V. 205.606 Listings

PCC encourages the NOSB to continue to reduce the substances permitted on the 205.606. With the growth of the organic market, we must continue to eliminate the now unneeded transitional systems that have become barriers to organic expansion. While we appreciate the need to maintain certain listings, we are encouraged to see several subcommittee recommendations that signal both stakeholder and NOSB support for removal of some sources, including Turkish bay leaves, sweet potato starch, and orange shellac.

Concerning kelp, however, we would encourage the addition of the same annotation (whether listed under 606 or moved to 205.607(b)) as that recommended for marine macroalgae to provide an interim solution as the NOP and NOSB work towards more comprehensive marine material guidance and/or regulations.

VI. Fenbendazole

As a co-op, PCC has a close relationship with its community—shoppers and producers alike. It is because of this relationship that our shoppers, members, and producers offer transparent feedback about products, concerns, production challenges, and much, much more. While our primary producers of PCC private label eggs have shared many concerns about production issues and pests—the most recent being how to manage the “harvesting” of their mobile henhouse and pasture-raised chickens and eggs by the increasing number of eagles (you can read about the canine solution [here](#))—we have yet to hear about concerns with worms. Additionally, despite selling an average of 18,000 dozen of our private label, pasture-raised eggs

per month in 2020 we have not received any complaints or comments concerning worms in eggs from our customers.

What we do receive are multiple comments from our shoppers and members continually demanding that we hold a high bar for organic. While we understand and respect that there sometimes can be a need for exceptions to this high bar in order to support the welfare of an animal or address a significant threat, we simply do not see this as an issue warranting this kind of exemption at this time and do not support the inclusion of fenbendazole on the national list.

VII. Supporting Organic as a Resilient Leader in the Face of Climate Change

The organic community has been long aware of the need for action to address climate change. As with many other events and issues of 2020, however, the urgency of addressing climate change became all too real as our region, along with the majority of the West Coast, suffocated under a hazardous blanket of smoke and witnessed crops and farmsteads destroyed by fire just over a month ago. Organic must be a leader in ushering in a new phase of solutions to address these imminent threats without a moment to lose.

At the state and national levels, we continue to see promising 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.

Some of this struggle is due to inaction on the part of the NOP to enact critical NOSB recommendations and enforce the OFPA's clear priorities on soil fertility development and practices, pasturing, and biodiversity. This needs to change. The other piece of the struggle, however, is in failing to provide a clear outline and measurement of the climate change benefits within the organic framework and production plans.

We continue to support the NOC recommendation to add to the NOSB workplan an agenda item focused 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. This work should also contemplate identifying carbon footprint measurement/benefit mechanisms that could be integrated into organic plans and feed into carbon monitoring certifications and systems being developed and considered worldwide.

VIII. Conclusion

PCC would again like to thank the NOSB 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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