



C O R N U C O P I A
I N S T I T U T E

Testimony Presented to the Fall Meeting of the National Organic Standards Board (NOSB)

October 24, 2018 – St. Paul, MN

By Mark Kastel – The Cornucopia Institute, Cofounder and Executive Director

Who owns the organic label? ... We all do.

We wish Dr. Tucker well. She inherits a troubled program.

When we founded the commercial organic movement, in the 1980s, and asked Congress to pass the Organic Foods Production Act, it was viewed as a social and economic justice vehicle for family farmers.

At \$50 billion, how is the organic movement working?

- Farmgate prices for milk are down 30-50%. Some farmers are selling out.
- Some fresh market fresh vegetable producers tell us CSA and market sales are down 30%. They can't compete with pseudo-industrial organics and hydroponics.
- Row crop producers can't compete with phony imports from China and former Soviet bloc countries, countries with histories of endemic commercial fraud in many sectors.

While the NOP and this board focuses on important micro issues, organic farmers are losing their livelihoods

Conflicts of interest – closing *the revolving door*:

What if a former certifier becomes head of the NOP?

Congress charged the USDA with oversight of the certification process, yet past audits by the Office of Inspector General have been damning in their criticism of the NOP accreditation program.

What if a former certifier becomes the cheerleader in chief, on behalf of certifiers, at the ACA meetings? The certifiers he is charged to aggressively oversee.

What if secret behind-the-scene deals are made benefiting certifiers to the tune of millions?

What if, based on documents we have obtained under the Freedom of Information Act, some of the largest certifiers had been found guilty of major illegalities ... And let off the hook?

And then, what if that official leaves the USDA and receives lucrative consulting contracts from the same certifiers they were just overseeing?

How would that look to the public?

... And what if a different former NOP leader overrules a certifier ordering them to allow an operator to substitute a small porch, accommodating maybe 3-5% the birds in the henhouse, instead of allowing them to go outdoors?

According to the law: All organic livestock must have access to the outdoors. What if the same NOP official, after retiring from the USDA, immediately becomes a consultant and lobbyist for the same egg producer?

NOSB members: Please close that revolving door.

Why should the organic regulatory structure be different than anything else that happens in Washington? ... Because we said so!