

Public Comment, 2020 Spring NOSB meeting  
April 23, 2020

Good afternoon. My name is Anne Ross. I am an attorney and director of international policy for The Cornucopia Institute.

Challenging times such as the one we are living in now have a way of shifting priorities – some by choice and some out of necessity. But there are certain efforts that cannot fall by the wayside without undermining core principles.

This is true in the organic sector and it's also true of its foundation, which depends on integrity.

That's why I encourage the Board and NOP to do everything in their power to ensure that the Strengthening Organic Enforcement Rule is published for comment. For years now, authentic organic grain farmers have been forced to compete with those who are intent on violating the rules.

At the same time, authentic organic dairy producers have watched as fraudulent grain made its way to operations feeding herds numbering in the thousands upon thousands of cows – calling into question the authenticity of entire supply chains.

The enforcement rule needs to be released for comment immediately to make sure it does what it should do, which means that it actually works for and protects all organic producers so that eaters get what they pay for every time they choose organic.

In addition to the publication of the Strengthening Organic Enforcement Rule, we strongly support research to test for pesticide and fumigant residues. Not only can testing detect fraud, the threat of testing can deter it.

There can be no tolerance for bad actors in the organic market **ever...** and certainly not in times like these where organic producers face uncertainty and many will face market disruption.

The empty shelves in some grocery stores indicate how easily disrupted our food system can become in times of crisis. The conventional, industrialized agriculture system supported by decades of a cheap, unsustainable food policy is a failure. The extreme cost to human and environmental health cannot be overstated.

This shows how important local and regional food systems are and how essential organic producers are in providing their communities with nutritious food.

In addition to working to finalize the Strengthening Organic Enforcement Rule, we need to make sure organic farmers are included in USDA's aid payments. Congress needs to hear from us.

Organic farmers who need assistance must be included in emergency disaster payments and farm loans.

Finally, our legislators, agencies, and public need to know that the organic community will not tolerate the intrusion of genetic engineering into organic production. Organic production is premised on being free from genetic modification – without exception.

In sum, even in the most challenging times, our foundational priorities cannot change – priorities including eliminating fraud, being there for organic producers in crisis, and adhering to fundamental organic tenets.

Thank you all for your time and service on this Board.