OFA Final Policy Positions

Every policy has passed a rigorous grassroots process and been voted on by OFA organic farm members.

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AFFORDABLE & ACCESSIBLE ORGANIC CERTIFICATION 1
ANIMAL WELFARE 2
BEGINNING FARMER & TECHNICAL ASSISTANCE 2
CLIMATE CHANGE & ENVIRONMENTAL POLICIES 3
CONTAMINATION 4
CORPORATE CONTROL/CONSOLIDATION 4
FARMER SAFETY NET PROGRAMS 5
ECONOMIC VIABILITY 7
Organic Data & Strategy 7
Marketing Investment 7
Farmer Investment 7
Supply and Demand 8
FOOD SAFETY 8
HYDROPONICS/CONTAINER GROWING 8
IMMIGRATION 8
NATIONAL ORGANIC PROGRAM 9
NATURAL RESOURCE CONSERVATION SERVICE (NRCS) PROGRAMS 10
ORGANIC INTEGRITY 10
Excluded Methods 11
Organic Workforce Development 11
NOP Enforcement 11
Fraud Prevention 12
Organic Materials 12
Increase Rigor of Organic Standards 13
ORGANIC RESEARCH 13
SEEDS & BREEDS 13

AFFORDABLE & ACCESSIBLE ORGANIC CERTIFICATION

Overview: OFA supports eliminating the financial burden of organic certification on farmers by expanding cost-share programs to cover fees at 100% reimbursement, with a minimum of $1,500 per scope. Funding levels should be reviewed annually for inflation and maintained at mandatory baseline levels to meet demand. The overarching goal is removing cost as a barrier so more farms can enter and stay in organic certification.

1. OFA SUPPORTS organic farmers NOT having to bear the cost of organic certification. (Adopted by the farmer membership in 2025.)

2. OFA SUPPORTS expanding the Organic Certification Cost Share program and other federal programs to cover certification fees for farms, as certification fees have proven to be a barrier to program entry and have caused farms to leave organic certification. Program funding levels shall be reviewed annually to account for inflation and the cost of living, and expanded to a minimum of $1,500 per scope, with 100% reimbursement. (Adopted by the farmer membership in 2023 and updated in 2025.)
3. OFA SUPPORTS renewal of, and baseline funding for, organic certification cost-share programs, with adequate mandatory funding to meet projected demand. Additional flexibility should be granted to the Secretary to support programs that benefit the transition and ongoing organic production. (Adopted by the farmer membership in 2018 and updated in 2025.)

ANIMAL WELFARE

Overview: OFA achieved animal welfare standards through the 2024 Organic Livestock & Poultry Standards Rule, though the 5-year implementation timeline was longer than the 0-3 years OFA had advocated for, along with clearer enforcement and continuous improvement mechanisms.

4. **ACHIEVED with Organic Livestock & Poultry Standards Rule (2024)**, but the implementation time was 5 years. OFA SUPPORTS animal welfare requirements as proposed in the Organic Livestock and Poultry Standards Rule (2022), with a 0-3 year implementation and clarity around enforcement and continuous improvement. (Adopted by the farmer membership 2023.)

BEGINNING FARMER & TECHNICAL ASSISTANCE

Overview: OFA supports comprehensive assistance for beginning and underserved farmers through expanded land access programs, higher microloan limits, and targeted grants and loans for land purchase and farm operations. They advocate for technical, financial, and marketing support through USDA agencies, NGOs, land-grant universities, and cooperatives — with particular emphasis on reaching minority, small-scale, and historically underserved farmers. Additional priorities include funding for organic transition incentives, urban agriculture, public service loan forgiveness for organic farmers, and a dedicated Beginning Farmer & Rancher Development Program focused on organic technical assistance.

Access to Land

5. OFA SUPPORTS increasing the FSA loan limit for farm ownership to reflect the average real estate and cropland values of farmland on an annual basis, as determined during the annual appropriations process. (Adopted by the farmer membership 2026.)
6. OFA SUPPORTS raising the FSA Microloan program limits to at least $100,000 each for the operator and ownership categories of microloans. (Adopted by the farmer membership 2023.)
7. OFA SUPPORTS the preservation of agricultural lands for organic production through programs such as agricultural land trusts, agricultural land easements, and agricultural land use protections. (Adopted by the farmer membership 2019.)

Access to Capital

8. OFA SUPPORTS programs and outreach that improve access to capital for owner/operators, especially small-scale operators, pursuing or maintaining organic certification by creating and maintaining targeted, accessible federal and state grants and loans for farmers to enter long-term leases, to purchase agricultural land, to cover farm operating expenses, and to obtain operating capital for equipment, facilities, etc., and increased funding and

higher funding limits for existing programs with those goals. (Adopted by the farmer membership in 2023 and updated in 2025.)

Urban Agriculture

9. OFA SUPPORTS the USDA prioritizing technical and financial assistance for the use of organic soil-based strategies in urban agriculture, including through the NRCS Office of Urban Agriculture and NRCS EQIP Organic Initiative. (Adopted by the farmer membership 2020.)

Policies That Would Strengthen Support for Farmers

10. OFA SUPPORTS targeted outreach, training, information, technical assistance, mentorship, land access and ownership in organic farming systems, USDA organic certification and transition, and organic market development for historically underserved, minority, and beginning farmers through USDA agency programs, land grant institutions, and NGOs. (Adopted by the farmer membership in 2019, revised by the farmer membership in 2024.)
11. OFA SUPPORTS programs that facilitate the creation of and provide technical and financial support for certified organic small- and mid-scale farmer production, processing, and marketing cooperatives. (Adopted by the farmer membership 2022.)
12. OFA SUPPORTS expanding governmental support for organic production through increased funding for organic agriculture, education, and technical assistance by non-governmental organizations (NGOs), land-grant universities, and extension; providing internal staff education on organic agriculture; and hiring leadership with demonstrated organic experience throughout the USDA and state agencies. (Adopted by the farmer membership 2021.)
13. OFA SUPPORTS a robust, nationwide, farmer-driven program that offers technical, financial, and marketing assistance to help existing organic, conventional, beginning, and underserved farmers expand and/or convert to organic production, and provides continuing education on the benefits of organic farming systems. (Adopted by the farmer membership 2020.)
14. OFA SUPPORTS legislation that adds certified organic farmers to the “public service loan forgiveness program”. (Adopted by the farmer membership 2019.)
15. OFA SUPPORTS organic transition incentive programs that provide financial and technical assistance to non-organic farmers to help them convert land to certified organic management systems. (Adopted by the farmer membership 2019.)
16. OFA urges Congress to include a Beginning Farmer & Rancher Development Program (BFRDP) funding priority for projects that provide organic technical assistance to beginning farmers. (Adopted by the farmer membership 2018.)

CLIMATE CHANGE & ENVIRONMENTAL POLICIES

Overview: OFA supports payment programs and funding mechanisms that reward organic farmers for climate-beneficial practices like soil health and carbon sequestration, with accessible participation for small and diversified farms. They also advocate policies that recognize organic agriculture as a key climate solution and help farmers adapt to climate change impacts.

17. OFA SUPPORTS addressing the pressing need to address climate change by providing targeted support, including payment programs, to farmers for organic practices that mitigate climate change, prioritizing the multiple benefits of organic practices including building soil organic matter, soil health, and other ecosystem services; and that these programs provide a fair way for farmers who have already adopted these practices, small farms, diversified farms, and farms in all regions of the country to participate in climate values claims or labels without

burdensome or expensive validation methods. (Adopted by the farmer membership in 2021, revised by the farmer membership in 2024.)

18. OFA SUPPORTS policies that recognize and promote the essential role of organic agriculture and the knowledge of organic farmers as a part of the solution to climate change. (Adopted by the farmer membership in 2019, revised by the farmer membership in 2024.)
19. OFA SUPPORTS funding mechanisms that reward farmers and land managers for scientifically proven long-term contributions of both early and recent adopters to ecological health and carbon sequestration, sometimes referred to as Payment for Ecosystem Services (PES). (Adopted by the farmer membership 2022.)OFA SUPPORTS policies that provide farmers with support for adapting to and dealing with increasing challenges arising from climate change. (Adopted by the farmer membership 2021.)
20. OFA SUPPORTS providing targeted support to organic farmers for soil organic matter/carbon sequestration, soil health and other ecosystem services. (Adopted by the farmer membership 2020.

CONTAMINATION

Overview: OFA supports holding chemical manufacturers and applicators liable for contamination of organic farms, with stronger enforcement, a pesticide tax for drift damages, and a ban on Dicamba. They also support government assistance and compensation for farms affected by PFAS contamination of soil and water.

Pesticide Drift

21. OFA SUPPORTS increased enforcement and fines against, prevention of, and compensation for losses associated with damage caused by genetic engineering, pesticide, and other chemical contamination of organic farms or crops. The manufacturers and applicators of these chemicals and technologies shall be held responsible and liable for their role in the contamination. (Adopted by the farmer membership in 2018 and updated in 2025.)
22. OFA SUPPORTS federal policy that both recognizes that pesticide drift and carryover cause great harm and provides redress to those affected. (Adopted by the farmer membership 2024.)
23. OFA SUPPORTS a tax on the manufacture and sale of pesticides to pay for drift and carryover damages. (Adopted by the farmer membership 2024.)
24. OFA SUPPORTS banning Dicamba (3,6-dichloro-2-methoxybenzoic acid). (Adopted by the farmer membership in 2025.)

Per- and Polyfluoroalkyl (PFAS) Chemicals

25. OFA supports an immediate ban on the application of biosolids, also known as “sewage sludge,” to farmland to avoid PFAS contamination. (Adopted by the farmer membership 2026.)
26. OFA SUPPORTS efforts by state and federal agencies to help farms cope with contamination of soil and water by per- and polyfluoroalkyl (PFAS) chemicals, including assistance with soil and water testing, technical assistance for determining whether farm operations can safely continue, and compensation for lost production and lost farm value due to contamination. (Adopted by the farmer membership 2022.)

CORPORATE CONTROL/CONSOLIDATION

Overview: OFA supports enforcing antitrust laws, limiting mergers, and redirecting subsidies toward local producers to combat corporate consolidation in agriculture and build regional food system resilience. They also support dismantling concentration in seed and livestock genetics to protect farmers' access to reliable, locally adapted crops and animals.

27. OFA supports policies that prioritize and promote regional food systems and domestic organic production. (Adopted by the farmer membership 2026.)

28. OFA SUPPORTS competitive markets and supply chains for agriculture and food products through active enforcement of antitrust laws and foreign ownership limits and policies that reduce current and future consolidation, limit mergers, redirect food and farmer subsidies toward local producers, and encourage local economic resilience through building regional food systems that support local producers, processors, and distributors and communities. (Adopted by the farmer membership 2023.)
29. OFA SUPPORTS dismantling the current concentration and consolidation in the breeding of seed and livestock genetics to protect farmers' access to reliable crops and livestock adapted to their situations. (Adopted by the farmer membership 2020.)

FARMER SAFETY NET PROGRAMS

Overview: OFA supports overhauling crop insurance to better serve organic farmers, including fairer APH and T-Yield calculations for diversified rotations, improvements to Whole-Farm Revenue Protection, and extending Dairy Margin Protection to cover organic feed costs. They advocate for new insurance tools tailored to innovative practices like intercropping and relay cropping, streamlined transitional insurance, and an organic literacy requirement within RMA so agents can better serve organic clients. On pricing, OFA pushes to remove artificial caps on organic price elections and ensure organic prices are used consistently across all federal farm programs.

Policies that improve existing Crop Insurance Programs

30. **ACHIEVED!** OFA SUPPORTS USDA-RMA allowing crops to be enterprised by organic, transitional or conventional practice type in a single policy. (Adopted by the farmer membership 2023.)
31. **ACHIEVED!** OFA SUPPORTS recognition by the USDA Risk Management Agency (RMA) that any practice approved in a farmer's Organic System Plan by a USDA-accredited certifying agent as compliant with organic production standards must be recognized and approved as a "Good Farming Practice" as defined by the RMA. (Adopted by the farmer membership 2022.)

APH & T-Yield

32. OFA SUPPORTS beginning, organic, and transitioning farmers being systematically supported by the county **T-Yield and the Actual Production History** (APH) rather than being disadvantaged by how these levels are established, which was not designed for longer diversified crop rotations. (Adopted by the farmer membership in 2025.)
33. OFA SUPPORTS allowing transitioning producers the option to calculate the Actual Production History (APH) for new acres under organic transition using the APH of other organic acres on their farm, in addition to the county T-yield. (Adopted by the farmer membership in 2018, revised by the farmer membership in 2024.)
34. OFA SUPPORTS allowing Annual Production History (APH) data from transition years 1-3 to be utilized as part of organic APH for land, which is managed according to organic standards during the transition. (Adopted by the farmer membership 2024.)

Whole-Farm Revenue Protection (WFRP)

35. OFA SUPPORTS the continued improvement of **Whole-Farm Revenue Protection (WFRP)**, established in the 2014 Farm Bill. Specifically, OFA urges the following changes:
    a. Share information among USDA agencies and organic certification agencies to help minimize the farmer's paperwork burden to participate in WFRP.
    b. Recognizing the change in farm revenue after a farm has transitioned to organic, raise the cap to 50% on increased revenue protection under the expansion provision.
    c. Better reward diversity in the WFRP system by removing the settlement deduction for other insurance policies when a WFRP claim is filed. (Adopted by the farmer membership 2024.)

Dairy Margin Protection Program

36. OFA SUPPORTS extension of the Dairy Margin Protection Program to cover organic dairy operations by using the cost of organic dairy feed and inputs to calculate organic milk margin. This change would make the program relevant for the needs of small to midsize dairy operations. (Adopted by the farmer membership 2024.)

Recommendations To Improve How Crop Insurance Serves Farmers

37. USDA should ensure all existing safety-net programs apply to and are accessible to organic and diversified producers of all sizes. (Adopted by the farmer membership 2026.)
38. OFA SUPPORTS the creation of new crop insurance tools that go beyond written agreements to better serve innovative practices (such as crop rotations, intercropping, relay cropping, etc.) and the development of diverse markets. (Adopted by the farmer membership 2024.)
39. OFA SUPPORTS establishing a unique final planting date for certified organic crops in each region, with a non-penalizing grace period so producers can maintain productivity and organic status. (Adopted by the farmer membership 2024.)
40. OFA SUPPORTS Risk Management Agency (RMA) providing transitional insurance to producers transitioning to certified organic status without requiring an Organic System Plan (OSP), and RMA accepting a statement from an organic service provider to affirm organic transition instead of an OSP. (Adopted by the farmer membership 2024.)
41. OFA SUPPORTS an organic literacy requirement within RMA to help employees and agents better understand organic insurance, better serve organic clients, and grow the benefits of the organic industry. (Adopted by the farmer membership 2024.)
42. OFA SUPPORTS consistent organic production data. AMS, NASS, and RMA should work together to regularly compile and report organic production, yield, and acreage data. (Adopted by the farmer membership 2024.)
43. OFA SUPPORTS the creation of new crop insurance tools that serve the needs of diversified organic growers serving all types of markets, including direct sales. (Adopted by the farmer membership 2022.)
44. OFA SUPPORTS the creation of new crop insurance tools that serve the needs of diversified organic growers. (Adopted by the farmer membership 2019.)
45. OFA SUPPORTS equitable and fair-market insurance programs that are accessible and relevant for all sectors of diversified organic (and transition-to-organic) producers. (Adopted by the farmer membership 2018.)

Crop Insurance Pricing

46. OFA SUPPORTS the development of more organic price elections and accurate pricing policies for crop insurance. Specifically, we urge USDA RMA to remove policies that artificially cap Contract Price Addendums at two times the conventional price election for a specific crop and utilize organic price elections across other USDA programs. (Adopted by the farmer membership 2024.)
47. OFA SUPPORTS the sharing of information and tools across USDA agencies to make programs accurately reflect the value and risk associated with various programs and forms of production. To achieve this, we support developing more organic prices for crop insurance and allowing organic farmers to use organic prices for all federal farmer programs, including NAP and FSA Farm Storage Facility Loan Programs. (Adopted by the farmer membership 2024.)
48. OFA SUPPORTS a revision to the RMA Organic Crop Insurance Program for first-year organic crop insurance applicants to receive the organic price for their crop insurance. The revision should specify that organic inspection should occur by the RMA crop insurance deadline (July 15), but the final review and final certificate are not required by the July 15 deadline for eligibility for an organic price for crop insurance. (Adopted by the farmer membership 2021.)

ECONOMIC VIABILITY

Overview: OFA supports a comprehensive National Organic Action Plan to build diverse local markets, improve production techniques, and increase domestic production. They advocate for $5 million in mandatory annual funding for the Organic Data Initiative to ensure accurate pricing and market data. Key investment priorities include promoting the environmental and health benefits of organic products to consumers, expanding access to organic foods through food assistance, and implementing mandatory plain-language GMO labeling. Additionally, OFA champions farmer-focused protections such as "right-to-repair" legislation, social equity in agricultural policy, and allowing organic farmers to opt out of conventional commodity checkoffs. To stabilize the market, they support federal Dairy Supply Management and legislation like the PRIME Act to reduce barriers to meat processing.

Organic Data & Strategy

49. OFA SUPPORTS the development and swift implementation of a **National Organic Action Plan** to build diverse and local markets; improve production techniques; increase access and availability to underserved communities; and provide financial and technical support to increase domestic production of all organic agricultural products. A National Organic Action Plan will facilitate production growth in conjunction with increased market opportunities, emphasizing the holistic benefits of organic agriculture. We support states in developing and implementing the same process. (Adopted by the farmer membership in 2023.)
50. OFA SUPPORTS that the USDA prioritize collecting accurate organic commodity, poultry, dairy, livestock, and specialty crop pricing data, adjusted for inflation, so market decisions can be based on accurate pricing information. (Adopted by the farmer membership 2019.)
51. OFA SUPPORTS reauthorization of the Organic Data Initiative (ODI) to provide $5 million per year in mandatory funding for USDA organic data efforts, as well as a continuation of existing language authorizing additional funding through the annual appropriations process. (Adopted by the farmer membership 2018.)

Marketing Investment

52. OFA supports policies and programs that facilitate and prioritize the inclusion of domestically-grown organic foods in public and institutional purchasing/procurement programs. (Adopted by the farmer membership 2026.)
53. OFA SUPPORTS additional USDA AMS financial investment to **promote the environmental, climate change, and health benefits of certified organic production** and the integrity of the National Organic Program to consumers. (Adopted by the farmer membership 2024.)
54. OFA SUPPORTS mandatory **country of origin labeling** for meat, poultry, dairy, fruits and vegetables, seafood, and nuts. (Adopted by the farmer membership 2022.)
55. OFA SUPPORTS expanding food and nutrition assistance programs to include additional funds that expand access to organic foods. (Adopted by the farmer membership 2022.)
56. OFA SUPPORTS mandatory transparent plain language (GE or GMO) on-package labeling of foods, including ingredients with genetic engineering techniques as defined by the National Organic Standards Board (NOSB). (Adopted by the farmer membership 2021.)

Farmer Investment

57. OFA SUPPORTS **right-to-repair** legislation that would allow farmers and independent mechanics to access diagnostic software, information, and other tools necessary to repair farm equipment. (Adopted by the farmer membership in 2022.)
58. OFA SUPPORTS **addressing issues of race, gender, and social equity in agricultural and food policies**, including promotion of participation, leadership, and successful empowerment of the affected communities, with an

understanding that structural racism, sexism, and inequality limit leadership, organizational, and movement success. (Adopted by the farmer membership 2021.)

59. OFA SUPPORTS implementation of a simpler mechanism for organic farmers to avoid paying into federal and state commodity checkoffs. (Adopted by the farmer membership 2020.)

Supply and Demand

60. OFA SUPPORTS providing a sustainable and profitable price to certified organic producers as the organic market grows in both numbers of farms and acreage. (Adopted by the farmer membership 2021.)
61. OFA SUPPORTS a federal Dairy Supply Management program to stabilize milk supply and prices for both conventional and organic dairies and their processors. (Adopted by the farmer membership 2019.)
62. OFA SUPPORTS legislation such as the PRIME ACT, which **permits state-inspected meat to be sold within that state**, thus eliminating the intrastate marketing barriers placed on livestock farmers by the requirement for USDA-inspected livestock slaughter and processing facilities, which are few and far between. (Adopted by the farmer membership 2019.)
63. OFA SUPPORTS programs that facilitate the creation of small farmer production, processing and marketing cooperatives. (Adopted by the farmer membership 2019.)

FOOD SAFETY

Overview: OFA supports ongoing improvements to the Food Safety Modernization Act to ensure that guidelines are science-based, practical, and remain fully compatible with existing organic standards and practices.

64. OFA supports improvements to the Food Safety Modernization Act to provide science-based, practical guidelines aligned with organic practices and standards. (Adopted by the farmer membership in 2018.)

HYDROPONICS/CONTAINER GROWING

Overview: OFA advocates for a mandatory three-year transition period for any location producing organic crops, including the land beneath containers and greenhouses. They strictly support organic certification only for soil-based systems where plants grow in the ground and obtain nutrients from the soil; consequently, they oppose and urge the revocation of organic certification for hydroponic and other non-soil-based production systems.

65. OFA SUPPORTS the NOP requiring a three-year transition period after the use of prohibited substances or activities on any part of a location that will produce certified organic crops or livestock, including the land under containers, mulches, benches, structures, and inside greenhouses, hoop houses, tunnels, or other structures. (Adopted by the farmer membership 2021.)
66. OFA SUPPORTS organic certification of crop production where typical terrestrial plants are grown to maturity in the ground with no barriers between the topsoil, subsoil, and bedrock. The plants must obtain the majority of their nutrients from that soil rather than from highly soluble fertilizers. OFA OPPOSES organic certification of hydroponic production and other production systems which do not meet the preceding requirement and URGES the NOP to revoke the organic certification of such operations. (Adopted by the farmer membership 2021.)

IMMIGRATION

Overview: OFA supports multi-pronged immigration reform that legalizes the existing farm labor force while retaining the H-2A program. They also advocate for a new agricultural work visa program that provides a pathway to a green card after a specified period of at-will agricultural work.

67. OFA SUPPORTS immigration reform that 1) legalizes the existing farm labor force, 2) retains the current H-2A program as is for those who need it, and 3) adds an agricultural work visa program that would require a specified number of years of at-will agricultural work for a specified minimum number of days per year that could lead to a green card if desired. (Adopted by the farmer membership 2019.)

NATIONAL ORGANIC PROGRAM

Overview: OFA supports rigorous, risk-based enforcement of NOP standards, targeting high-risk operations and complex supply chains while demanding greater transparency in enforcement actions. They advocate continuous improvement by requiring the NOP to update practice standards beyond the National List periodically. To protect market integrity, they support increased funding for the NOP and Department of Justice to deter fraud, as well as a dedicated Policy Advisory position to coordinate organic policy within the USDA. Regarding the National Organic Standards Board (NOSB), OFA insists that an actual farm operator fill the farmer seat and strongly opposes any reduction in the Board's authority or changes to its stakeholder balance.

68. OFA SUPPORTS full and equitable enforcement of NOP standards: USDA should take immediate action to adopt a risk-based approach to oversight of organic operations, focusing first on high-risk operations and those with complex supply chains, and to bring non-complying operations and their organic certifying agents into compliance or exclude them from the program. USDA should be required to provide more transparency about the enforcement actions taken by NOP and its accredited certifying agents. Congress should use its oversight authority to ensure that USDA takes the necessary actions to tighten enforcement. (Adopted by the farmer membership in 2018, revised by the farmer membership in 2024.)
69. OFA SUPPORTS requiring USDA's National Organic Program (NOP) to periodically review and update organic practice standards (beyond the National List of allowed and prohibited materials) to ensure continuous improvement in organic standards. (Adopted by the farmer membership 2023.)
70. OFA SUPPORTS targeted organic education and a Memorandum of Understanding among the NOP, Department of Justice, Customs and Border Protection, and other relevant agencies to deter both import and domestic fraud within the organic market. (Adopted by the farmer membership in 2021.)
71. OFA supports strengthening integrity throughout the organic supply chain by increasing the NOP budget and holding the NOP accountable to do the following:
    a. improve inspection, review, and testing protocols using existing USDA inspection and auditing entities,
    b. develop new unique-to-organic strategies, including spot reviews of high-risk operations, and
    c. improve the Organic Integrity Database for greater transparency of acreage, production records, and transaction records. (Adopted by the farmer membership 2020.)
72. OFA SUPPORTS amending NOP Rule §205.204(a)(1) to add "and microgreens" after "edible sprouts". (Adopted by the farmer membership 2020.)
73. OFA SUPPORTS funding and filling the Organic and Sustainable Agriculture Policy Advisory staff position to serve as a communications link between the National Organic Program (NOP) and the Office of the Secretary of Agriculture to work directly with the Secretary, the Deputy Secretary, and the agency leaders within USDA to coordinate organic policy and educate the Department's personnel about organic farming and what the National Organic Program (NOP) does and why it is important to the other goals of USDA. (Adopted by the farmer membership 2018.)

74. OFA SUPPORTS a fully funded certification and accreditation process that is transparent, risk-based (prioritization of problem areas), and requires producers and handlers to uphold high integrity in their organic production practices. (Adopted by the farmer membership 2018.)

National Organic Standards Board (NOSB)

75. OFA SUPPORTS strong farmer input into the NOSB process, and supports requiring that the farmer seat on the NOSB must be filled by a certified organic farm operator (according to USDA-ERS definition), with a diversity of markets, geographies, and scales represented. (Adopted by the farmer membership in 2019 and revised by the farmer membership in 2026.)
76. OFA SUPPORTS the NOP formally accepting and implementing the National Organic Standards Board's (NOSB) excluded methods determination and technology framework, as well as the continuing work of the NOSB in these determinations. (Adopted by the farmer membership 2020.)
77. OFA SUPPORTS the NOSB recommendation to eliminate the incentive to convert native ecosystems to organic production and urges the NOP to take immediate action to implement this regulatory change and guidance to protect the biodiversity and essential environmental services offered by these unique lands. (Adopted by the farmer membership 2020.)
78. OFA OPPOSES any efforts to reduce the authority and role of the National Organic Standards Board (NOSB) in the overall standard-setting process, or to seek statutory changes to the delicate balance of stakeholder slot allocations for the Board membership. (Adopted by the farmer membership 2018.)

NATURAL RESOURCE CONSERVATION SERVICE (NRCS) PROGRAMS

Overview: OFA supports updating all NRCS programs better to accommodate the unique activities of organic and transitioning producers. This includes establishing equitable payment thresholds and ensuring that agency staff receive specific training in organic production systems.

79. OFA supports stronger State and Federal programs that recognize that certified organic operations are regenerative and, per se, eligible for programs supporting regenerative agriculture. (Adopted by the farmer membership 2026.)
80. OFA SUPPORTS updating all NRCS programs (EQIP, CRP, CSP, etc.) to include and provide for the unique activities and diversity typically found in organic production, to include transitioning producers in organic programs, to make payment thresholds for organic and non-organic programs equitable, and to ensure that county- and state-level staff are trained and knowledgeable about organic production to ensure robust and consistent implementation of all applicable programs, including NRCS practice 823 to these producers. (Adopted by the farmer membership 2024.)

ORGANIC INTEGRITY

Overview: OFA advocates for a high-integrity organic supply chain and has achieved milestones in certifying non-retail handlers and implementing the "Origin of Livestock" rule. They support clear disclosure of gene-editing techniques like CRISPR and demand that the USDA recognize these as genetic modifications. To ensure consistent oversight, OFA supports funding for organic workforce development, including specialized training and qualification criteria for inspectors and certifiers. They also push for strict penalties for certifiers involved in fraud and advocate for maintaining rigorous pasture standards, including a minimum of 120 days on pasture for dairy herds. They also support transaction certificates and enhanced import tracking to prevent domestic and foreign fraud. Finally, OFA opposes highly soluble nutrients like ammonia extract and sodium nitrate, arguing they conflict with organic soil health practices.

81. **ACHIEVED with Strengthening Organic Enforcement Rule (2024)!** OFA SUPPORTS the certification of all non-transport handlers and brokers of bulk, non-retail certified organic products including importer-handlers of organic products and ingredients. (Adopted by the farmer membership 2018.)
82. **ACHIEVED with Organic Livestock & Poultry Standards Rule (2024)!** OFA SUPPORTS the reactivation of the 2015 Origin of Livestock Proposed Rule and the publication of a Final Rule in 2019 that revises the current regulation so that it aligns with the principles expressed in the preamble of the December 21, 2000 Federal Register National Organic Program Final Rule (page 80570). (Adopted by the farmer membership 2019.)
83. **ACHIEVED with Origin of Livestock Final Rule (2022)!** OFA SUPPORTS an immediate implementation of the Final Origin of Livestock Rule and asks the USDA to prioritize the following previously submitted comments in the writing of the Final Rule:
    a. A producer as defined by the USDA NOP may transition bovine dairy animals into organic production only once.
    b. A producer is eligible for this transition only if they convert an entire established non-organic dairy operation to organic production at the same geographic location within a defined 12-month period. Once that transition has started, other non-organically certified animals cannot be added to the herd.
    c. This transition must occur over a continuous 12-month period prior to production of milk or milk products that are to be sold, labeled, or represented as organic.
    d. A producer must not transition any new bovine dairy animals into organic production after the end of the 12-month transition period.
    e. A producer is not eligible for the exemption if it has been used by a Responsible Connected person who has 20% or more ownership share in their legal entity.
    f. The certifying entity will file an organic system plan prior to the start of transition, and the transition process is overseen by the certifier as part of their accountability.
    g. Transitioned animals must not be sold, labeled, or represented as organic slaughter stock or organic bovine dairy animals.
    h. If organic management of the dairy animal, starting at the last third of gestation or at any other time it has been organic, is interrupted, the animal cannot be returned to organic certification.
    i. Split bovine conventional and organic milking herds at the same location are prohibited.
    j. Once the regulation is finalized, all entities will be required to immediately meet the requirements of the Final Rule. There will be no implementation period. (Adopted by the farmer membership 2019.)

<u>Excluded Methods</u>

84. OFA supports clear recognition by the USDA that CRISPR and other gene-editing techniques of seeds and breeds are genetic modification and that the USDA requires that genetic modification must be disclosed at the time of sale. (Adopted by the farmer membership 2024.)

<u>Organic Workforce Development</u>

85. OFA SUPPORTS USDA funding of organic workforce development programs to improve training for and recruitment of organic professionals, including but not limited to inspectors, certification staff, and technical service providers. (Adopted by the farmer membership 2024.)
86. OFA SUPPORTS USDA hiring leadership with demonstrated expertise and experience in organic production, and providing staff education that builds organic knowledge and proficiency. (Adopted by the farmer membership 2018.)
87. OFA SUPPORTS that USDA develop specific qualification criteria, expertise, and testing to illustrate proof of knowledge, and that this be required of all accredited certifiers, inspectors, and review staff to result in consistent oversight and interpretation of the rule for each scope of production. (Adopted by the farmer membership 2018.)

NOP Enforcement

88. OFA SUPPORTS increased NOP funding to strengthen enforcement activities through a consumer and producer complaint hotline, and market surveillance to verify correct use of the organic label at physical and internet retail locations. (Adopted by the farmer membership 2023.)
89. OFA SUPPORTS USDA NOP guidance and training to certifiers to implement new organic rules, as well as a grant program to fund certifier implementation costs. (Adopted by the farmer membership 2023.)
90. OFA SUPPORTS consistent enforcement of a minimum standard for diversity in annual crop systems. (Adopted by the farmer membership 2023.)
91. OFA SUPPORTS increased NOP enforcement measures and transparency of enforcement taken within the Pasture Compliance Program, both on certifiers and operations, and a focus on the operations with the highest risk for non-compliance. (Adopted by the farmer membership 2021.)
92. OFA SUPPORTS strict consequences for Accredited Certifying Agencies (ACA) implicated in domestic or foreign fraud and significant non-compliance, including: an immediate, significant monetary fine; required three years of expanded training and audits; a three-year suspension of any new clients; and notification to existing clients and the public. (Adopted by the farmer membership 2020.)
93. OFA SUPPORTS a consistent interpretation and implementation of §205.237 Livestock feed and §205.239 Livestock living conditions that upholds the intention of the rule; requiring access to pasture during the pasture season and a minimum of 120 days on pasture and 30% daily dry-matter intake from pasture for each herd subgroup (milking cows, dry cows, heifers). There must be a consistent and required policy and calculation matrix for pasture dry matter intake and pasture consumption for the 120-day organic dairy pasture rule. Risk-based unannounced additional inspections must be routinely conducted to ensure compliance. (Adopted by the farmer membership 2018 and revised by the farmer membership in 2019.)
94. OFA SUPPORTS the clarity and integrity of organic standards in the marketplace. (Adopted by the farmer membership 2018.)

Fraud Prevention

95. OFA SUPPORTS expanded funding for both the National Organic Program and the Department of Justice to protect the organic market from domestic and foreign fraudulent use of the organic label. Improved systems should be federally funded and implemented to keep compliance costs affordable for both organic producers and certifiers, and avoid implementation costs being passed on to the consumer in the organic marketplace. (Adopted by the farmer membership 2022.)
96. OFA SUPPORTS criminal prosecution of intentional organic fraud because unpunished fraud diminishes the value of the label. (Adopted by the farmer membership 2021.)
97. OFA SUPPORTS more NOP resources dedicated to collaborating and sharing information with our foreign organic partners who have developed strategies to deter and discover fraud. (Adopted by the farmer membership 2021.)
98. OFA SUPPORTS NOP implementing, with input from the community, the use of transaction certificates to verify the organic integrity of product sales by producers, handlers, and brokers. (Adopted by the farmer membership 2020.)
99. OFA SUPPORTS giving NOP the authority needed, in coordination with Customs and Border Protection, to implement enhanced procedures to track organic imports and ensure that imported products fully comply with U.S. organic standards. (Adopted by the farmer membership in 2018 and revised by the farmer membership in 2026.)
100. OFA SUPPORTS strengthening USDA import inspection, review, and testing protocols to ensure organic label integrity. (Adopted by the farmer membership 2018.)

Organic Materials

101. OFA SUPPORTS limiting the use of highly soluble nutrients (including the prohibition of Ammonia Extract and Sodium Nitrate) for use in organic production because such use is incompatible with OFPA and good soil health practices. (Adopted by the farmer membership 2022.)
102. OFA SUPPORTS adding to §205.203 (f) a ceiling of 20% of crop needs on the use of nitrogen products with a C:N ratio of 3:1 or less. This policy prevents the excess use of soluble fertilizers while also prohibiting the stacking

of different soluble sources. It is also worth noting that obtaining the C:N ratio of a material is much easier than getting information about the solubility or nitrogen availability of a material. (Adopted by the farmer membership 2022.)

103. OFA SUPPORTS the NOSB 2021 vote petitioning the listing of Ammonia Extract in § 205.602 (Non-Synthetic substances prohibited for use in organic crop production) in the National list, as well as the listing of a standardized definition of Ammonia extract in § 205.2 (Terms defined) of the NOP regulations. (Adopted by the farmer membership 2022.)
104. OFA SUPPORTS prohibiting the use of ammonia extract for use in organic production because such use is incompatible with OFPA and good soil health practices. (Adopted by the farmer membership 2022.)
105. Consistent with NOSB's April 2011 recommendation, OFA SUPPORTS re-listing Sodium Nitrate on 7 CFR 205.602 without annotation. This rulemaking action would make sodium nitrate prohibited in organic farming and eliminate the use of this soluble, plant-available fertilizer, which circumvents natural nutrient cycling in organic soil management. (Adopted by the farmer membership 2019.)
106. OFA SUPPORTS that all National Organic Program materials go through the OFPA-required independent five-year sunset review by the NOSB to remain on the National List and that the USDA immediately stop labeling a material listing as an "invalid listing" as no definition nor explanation of procedures for determination and management for the term exists. (Adopted by the farmer membership 2019.)

Increase Rigor of Organic Standards

107. OFA SUPPORTS strengthening the requirements to increase the days on pasture and the percentage of pasture required, except in cases of weather disasters. (Adopted by the farmer membership 2020.)
108. OFA SUPPORTS increasing the requirements to improve or maintain soil health in organic certification. (Adopted by the farmer membership 2021.)

ORGANIC RESEARCH

Overview: OFA supports increased federal funding for research, aiming for a percentage that matches the organic industry's retail market share. Priority research areas include organic systems' role in climate change mitigation, comparisons of carbon sequestration in organic versus conventional no-till systems, and the quantification of the economic impact of fraud. They also advocate for shifting research metrics from "yield-based" to assessments of nutrition, environmental benefits, and net dollars produced per acre.

109. OFA SUPPORTS increased USDA research on how organic systems provide long-term mitigation and adaptation to climate change. (Adopted by the farmer membership 2023.)
110. OFA SUPPORTS research that compares organic and conventional no-till production systems and the difference in carbon sequestration ability over the long term. (Adopted by the farmer membership 2021.)
111. OFA SUPPORTS research that identifies the value of nutrition, human health, environmental benefits, and net dollars produced per acre or animal unit for organic production rather than the typical yield-based assessment. (Adopted by the farmer membership 2021.)
112. OFA SUPPORTS research that quantifies the scope of fraud within the organic industry and the economic impact of fraud on domestic certified organic producers. (Adopted by the farmer membership 2021.)
113. OFA SUPPORTS research into methods for improving soil health and the development of more organic, biological, and cultural management of disease, weeds, and pests, so these methods do not hinder soil (Adopted by the farmer membership 2021.)
114. OFA supports increasing funding of federal organic agricultural production research to at least the same percentage represented by retail organic USD sales within the US marketplace. Funding should prioritize research on working organic farms and include farmer-led research to ensure it is practical for organic farmers.
115. (Adopted by the farmer membership in 2018 and revised by the farmer membership in 2026.)

SEEDS & BREEDS

Overview: OFA supports the total elimination of non-organic seed use in organic production by 2030 through uniform enforcement and oversight. They advocate for $50 million in annual federal funding dedicated to public plant and animal breeding programs, with a specific focus on developing regionally adapted organic cultivars and breeds.

116. OFA SUPPORTS NOP adopting the National Organic Standards Board (NOSB) recommendations on organic seeds and developing a plan to eliminate the use of non-organic seeds in the production of organic crops by 2030. This will require uniform enforcement by Accredited Certifying Agencies (ACAs) of the requirement to use organic seed and adequate USDA oversight of certifiers. (Adopted by the farmer membership 2020.)
117. OFA SUPPORTS increased and dedicated funding for organic public seeds and breeds research. (Adopted by the farmer membership 2019.)
118. OFA SUPPORTS the new Farm Bill requiring USDA's National Institute for Food and Agriculture (NIFA) to use its existing competitive grants research programs to collectively allocate $50 million annually to public plant and animal breeding programs, with a priority focus on developing regionally adapted organic cultivars and animal breeds excluded from the Plant Protection Act. (Adopted by the farmer membership in 2018.)