



April 05, 2023

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP

Docket: AMS-NOP-22-0071

RE: CAC Subcommittee – Proposal: Organic Is Climate-Smart Agriculture

Dear Ms. Arsenault:

Thank you for this opportunity to comment on the National Organic Standards Board (NOSB) Compliance, Accreditation & Certification Subcommittee's (CACS) proposal, Organic Is Climate-Smart Agriculture.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. We are the leading voice for the organic trade in the United States, representing more than 10,000 organic businesses across 50 states. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

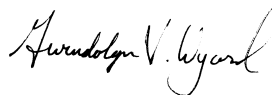
The CACS proposes certified organic producers should be automatically considered climate-smart and made eligible for all climate-smart funding, buying, and other programmatic opportunities administered by the USDA. OTA supported and [offered many supplements](#) to the Fall 2022 [climate-smart discussion document](#). The proposal for the Spring 2023 meeting appears to be unchanged without any discussion around the stakeholder comments received and why they were not incorporated.

OTA believes the CACS proposal would have been stronger with the incorporation and/or discussion of stakeholder feedback. However, the proposal is still a substantial piece of work, and we celebrate the subcommittee's continued advocacy to recognize organic as climate smart. Organic is the original climate-smart commercial agriculture in the United States. Fossil fuel-based and most synthetic fertilizers and pesticides are prohibited in organic agriculture, and their manufacture and application constitute more than 10% of direct global agricultural GHG emissions.ⁱ Across all food groups, organic production uses around 50% less new reactive nitrogen in comparison with conventional production.ⁱⁱ NRCS recognized climate-smart techniques such as cover cropping, organic soil amendments, and crop rotations are required in organic production.ⁱⁱⁱ In a 2017 study, organic growers who adopted best practices increased their soil organic carbon by 26%.^{iv}

Organic farmers are dedicated to practices that have the power to reverse the effects of climate change, while increasing farm resilience in the face of droughts and floods. We look forward to the memorialization and codification of organic's climate change mitigation and soil regeneration. We are optimistic that USDA will increase their support and encouragement of organic farming systems as the climate, economic, and health benefits of those systems are continuously revealed. The CACS proposal, as written, supports this end goal and should signal to the greater USDA that certified organic production should be automatically considered "climate-smart" agriculture.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,



Gwendolyn Wyard
Vice President, Regulatory, OTA

cc: Tom Chapman
Chief Executive Officer, OTA

ⁱ Walling, Eric, and Celine Vaneeckhaute. “Nitrogen Fertilizers and the Environment.” In Nitrate Handbook. CRC Press, 2022.

ⁱⁱ Shade, Jessica et al. 2020. “Decreasing Reactive Nitrogen Losses in Organic Agricultural Systems.” Organic Agriculture. <https://doi.org/10.1007/s13165-020-00297-0> (July 14, 2020)

ⁱⁱⁱ 7 C.F.R. §§ 205.205-206

^{iv} Elham A. Ghabbour et al., “National Comparison of the Total and Sequestered Organic Matter Contents of Conventional and Organic Farm Soils,” in Advances in Agronomy, vol.