

September 10, 2017

Dear Organic Community,

After 8 years of leading the USDA National Organic Program, I'm headed back home to Olympia, Washington. It has been an incredible honor to serve you and an extremely gratifying experience. I've been contemplating this move for the last few years, but now is the right time to move on. I'm 60 now, my grandchildren are growing, and I want to spend more time with them. I'm ready to have a less intense work-life and to spend more time biking and birding. I will miss the people at AMS and NOP immensely. Each and every day, they use their talents to protect organic integrity and support the organic community. They will do a great job of continuing to serve you, protect organic integrity, and build the organic sector.

I want to thank all of you for building an incredibly diverse, prosperous, and life-enriching organic agriculture sector. Specifically, I appreciate:

- The thousands of organic farmers, ranchers, processors, handlers, and traders that produce, process and distribute organic products all over the world. Your work supports biodiversity, protects soil and water quality, and brings economic vitality to many communities.
- The certifiers and inspectors that verify that organic standards are met and enforce the standards when they are not.
- Consumers who choose organic and thereby support organic producers, handlers, and organic agriculture.

It has been interesting to reflect on how things have changed since I arrived at USDA in 2009. In those first months, I asked the National Organic Coalition, Organic Trade Association, certifiers, and others to provide me a list of their priorities for the National Organic Program. It was a long list that included implementing NOSB recommendations, improving the NOP's quality system, enforcing the regulations, and improving communication. In my enthusiasm, I believed we could get it all done and, for the most part, we did. We transformed the NOP into a respected and functional program that is highly regarded within USDA and around the world.

I'd like to highlight my top ten list:

1. **Quality Management** - We developed a **quality management system** to improve program consistency and effectiveness. We implemented the **NOP Strategic Plan** that incorporates the vision of the program - **Organic Integrity from Farm to Table, Consumers Trust the Organic Label**. We initiated a **peer review process** as required by the Organic Foods Production Act.
2. **Communication** - We improved communication and the transparency of the program through improvements to the website and the **NOP Organic Insider**.

We implemented the **Organic Literacy Initiative**, which trains USDA personnel and farmers about certification and market opportunities in the organic food industry.

3. **Certification** - We developed and implemented the **NOP Handbook**, which has transformed the organic control system by providing all NOP policies and guidance in one place. We implemented a **Sound and Sensible** certification process to make organic certification more affordable and attainable for organic operations. We developed new **interactive training programs** for certifiers and inspectors, and improved the certification process by requiring **unannounced inspections** and **residue testing**.
4. **Accreditation** - We ensured that all audits were conducted, and tightened up the accreditation process to promote consistency between certifiers. We strengthened the quality of the **organic control system** by suspending, revoking, or accepting the surrender from certifiers who did not embrace the “Age of Enforcement.” We ensured that all certifiers improved the rigor of their inspections and certification processes.
5. **NOP Appeals** - We reengineered **NOP appeals**, cutting appeal times in half.
6. **Enforcement** - We implemented the “**Age of Enforcement**” and now use **civil penalties** regularly for violations to the USDA organic regulations. We assist certifiers in their enforcement actions, which have included over 900 suspensions or revocations over the last 5 years. We assisted the Department of Justice with multiple cases of fraud including liquid fertilizers and seeds.
7. **Standards** - We finalized and implemented the **Pasture** rule to ensure that all organic ruminant livestock operations are pasture based. We published and implemented the **Residue Testing** rule. We published the **Organic Livestock and Poultry Practices** rules. We published multiple **Sunset Materials** rules, as well as multiple **National List** rules.
8. **National Organic Standards Board (NOSB)** - We collaborated with the NOSB, and moved the NOSB meetings out of Washington, DC. We received an Office of Inspector General “**No Findings**” **Report** on NOP’s management of the National List of Allowed and Prohibited Substances. This was particularly significant, as advocacy groups and the media have scrutinized the program’s handling of the National List over the last few years. We revised the **Sunset Review Process** to provide for more public input and a fair and transparent process.
9. **International Activities** - We negotiated the **U.S. – EU Organic Equivalency Arrangement**, opening up the second largest organic market to U.S. organic producers and handlers. We conduct regular **assessments of all equivalency and recognition arrangements**. We’ve conducted **competent authority and certifier training** for governments and certifiers operating in Latin America.

10. Organic Integrity Database - We went from having no public listing of organic farms and businesses, to having a robust database updated by certifiers in near real time.

Challenges and Opportunities

The organic community will have many challenges and opportunities in the years ahead. A few issues stand out.

Embrace diversity –

The organic world is diverse from many perspectives. Organic food is produced in diverse environments, from temperate climates to deserts to tropical rainforests. Organic farmers and processors have developed a diversity of practices that comply with the organic standards and organic principles. Embracing this diversity of production is critical as the organic sector grows. Organic farms come in all sizes and shapes. All types of people of varying cultural, religious, and political perspectives participate. It is critical that we embrace organic diversity in all its size, shape, and color.

Upwards for the future –

We will be much more successful if we support each other as we confront challenges of water availability and climate change. We will be more successful if we treat each other with respect and dignity.

Materials –

Inputs used in organic production and processing are critical to the success of the organic sector. Farmers need inputs for fertility and pest control. Livestock producers need feed supplements and health maintenance materials. Processors need minor ingredients and processing aids to bring the full diversity of farm production to the table. All allowed organic inputs need to align with organic standards and principles. Materials should be viewed by how they support the organic system. The material review process should not become too reductionist, or focused on ingredients within ingredients within ingredients, when they have no effect on the agroecosystem.

The future of organics includes -

- Farmers producing food and fiber using local natural resources for a local marketplace and remaining rooted in the locality of place.
- Agricultural systems in all scales of production that promote biodiversity, protect soil and water, and eliminate toxic inputs in production and processing.

- Organic food should be available to everyone from the cities to the countryside. We need all systems and scales of production to transform the agricultural system.

For the next Deputy Administrator, I share some points that I hope will help as he or she settles into the position:

- Spend time with organic producers and handlers. Observe audits of certifiers. Meet with the organic community often, and listen carefully to the wisdom they can provide.
- Read the Organic Foods Production Act. Read it again.
- Read the USDA organic regulations frequently and often.
- Some stakeholders use misinformation and personal attacks to push their agenda. It is critical to provide accurate, objective information in a timely manner to counter the misinformation campaigns.
- You can't solve everything. Identify the items that will have the broadest and most lasting impact.

What's next

The AMS National Organic Program will be in excellent hands under the leadership of AMS Acting Administrator Bruce Summers and Acting Deputy Administrator Jenny Tucker. The NOP has excellent auditors, compliance officers, and agricultural marketing specialists. They will continue to clarify organic standards, conduct audits of certifiers, and enforce the standards when necessary.

I'll be leading the NOP through the end of September. After that, I'll be taking some time off – spend more time with my grandkids, be outside, biking, birding and juggling. Then I'll look for other opportunities to serve the organic community from my home in Olympia. Please keep in touch – my email is milesorganic@gmail.com. Hope to see you on an audit or out on the farm in the future.

Organically yours,



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