

**Public Comment, 2022 Spring NOSB meeting  
April 21, 2022**

Good afternoon members of the NOSB and NOP. My name is Marie Burcham. I am the Policy Director for The Cornucopia Institute.

Our planet is experiencing extreme stress due to climate change — potentially climate disaster — that will fundamentally alter how we relate to our environment. Some of this change is caused by the way we farm. Despite this reality, the USDA seems bent on staying the course with their general support of chemically-intensive farming.

The NOSB has asked other commenters what it would take to increase organic's share of the market to 50%. What it will take is a broad recognition that conventional agriculture as we know it is a failure in all counts. It is more expensive, more dangerous, less socially beneficial, and produces less nutritious and less flavorful food. A growing body of scientific research shows that farming systems designed and managed according to agroecological principles **can** meet the food needs of our society, while also addressing our serious environmental and social issues.

To expand the organic marketplace, we need to improve integrity and transparency throughout the agricultural system. The whole organic system must commit to **continuous improvement**. We need the organic label to stand for true conservation agriculture, as an example for how all farming should be.

The organic marketplace needs to solve its existing problems, and strive to be better for tomorrow. Of particular concern are issues of **consistency, rule improvements, and transparency and information**:

- A certifier survey on policies for three-year transition periods **showed serious inconsistencies**. These inconsistencies encourage bad actors to cheat the system, pushing the industry as a whole away from the goal of continuous improvement.
- We support technical assistance for the NOSB, knowing that these volunteer roles are a heavy lift. Part of that technical support should include expertise and guidance on the most recent research, including that presented by public commenters.

Additionally, we recognize that the NOSB cannot consider economics when evaluating substances on the National List; however, the NOP should not let economic factors drive decision-making concerning environmental or human health.

Focusing on staying true to principles of conservation agriculture and maintaining continuous improvement is critical to help the organic marketplace grow.

Finally, we are very concerned about the additions to the PPM that may have the effect of limiting free speech in a federal public forum. The phrase "personal attacks" is subjective. Sometimes comments that might "impugn the character" are factual — and free speech protects those kinds of remarks. There are real questions about whether the NOSB can restrict commenters in this manner and we would like to see the USDA's attorneys address these concerns.