

Good afternoon. My name is Anne Ross. I am an Organic Investigator for the Cornucopia Institute and member of the policy team. I'd like to thank the NOSB members for their time here today.

I'll briefly address three issues:

The first, is the consistency in parcel identification. We support the baseline requirement of using GPS coordinates to obtain consistent location information, unless the operation or certifier can articulate with specificity why an exception is appropriate. As noted in some of the comments, a one size fits all approach may not be appropriate for some operations. For those operations, we urge the NOP to issue guidance specifically articulating the circumstances in which an exception to providing GPS coordinates would be acceptable. Clearly, the goal is to establish an accurate means of identification so inspectors can do their jobs – if it's not GPS, then a verifiable alternative for that operation should be required and the guidance should clearly articulate the standards for exceptions.

Second, we support building on the SOE framework of additional residue testing. We have long supported testing of bulk imports. We know thousands of metric tons of fraudulent grain were imported into the U.S. having been treated with prohibited fumigants. We called for consistent, unannounced testing then and continue to do so – let's identify the noncompliant product before distribution, and when possible before it travels through the supply chain. At the very least, testing is a deterrent for bad actors. Strengthening periodic, and unannounced residue testing will stop noncompliant product from entering the supply chain or help identify where it has.

Finally, we must join together in dispelling anti-organic propaganda. Consumers often ask about information they see from sources like social media. A look at social media content, for example, shows there is an increasing amount of misleading information about food labels generally – often hailing the virtues of some that carry no legal or generally agreed upon definition –and others that disparage "organic." Transparency in "organic" helps ensure that there remains some baseline consensus about the facts.

We must ensure authentic "organic" is not redefined by misinformation campaigns, the disastrous impact and influence of factory farming, and the unchecked power of monopolies in our food system. When a few mega companies consolidate and control the food system and the messaging around it, consumer choice is nothing more than an illusion. A food system where several corporate giants dictate what we eat, what we grow, and how much farmers are paid is without a doubt a threat to the "organic." These few should not define, dictate, or dilute what "organic" means.

Thank you for your time today.