Q4 PROPOSED POSITION:OFA SUPPORTS full and equitable enforcement of NOP standards: USDA should take immediate action to focus first on high risk operations 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 their accredited certifying agents. Congress should use its oversight authority to ensure that USDA takes the necessary actions to tighten enforcement.



Q5 PROPOSED POSITION:OFA SUPPORTS strengthening USDA import inspection, review, and testing protocols to ensure organic label integrity.



Q6 PROPOSED POSITION:OFA SUPPORTS the Organic Farmer and Consumer Protection Act, which includes new Farm Bill requirements for USDA, 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.



Q7 PROPOSED POSITION: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.



Q8 PROPOSED POSITION:OFA SUPPORTS the USDA hiring leadership that has demonstrated expertise and experience in organic production, and USDA providing staff education that results in organic knowledge and proficiency.



Q9 PROPOSED POSITION: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.



Q10 PROPOSED POSITION:OFA SUPPORTS the clarity and integrity of organic standards in the marketplace.



Q11 PROPOSED POSITION: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.



Q12 PROPOSED POSITION: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.



Q13 PROPOSED POSITION:OFA supports prevention of, and compensation for losses associated with, damage caused by genetic engineering and pesticide contamination of organic crops and other affected areas.



Q14 PROPOSED POSITION:OFA OPPOSES organic certification of hydroponic production.



Q15 PROPOSED POSITION:OFA urges the National Organic Program (NOP) to revoke the organic certification of currently certified hydroponic systems and cease certification of new hydroponic operations.



Q16 PROPOSED POSITION:OFA SUPPORTS renewal of organic certification cost-share programs, with adequate mandatory funding to meet projected demand. Additional flexibility should be given to the Secretary to support programs beneficial to transition and ongoing organic production.



Q17 PROPOSED POSITION:OFA SUPPORTS increasing funding of federal organic agricultural production research to at least the same percentage represented by retail organic sales within the US marketplace.



Q18 PROPOSED POSITION:OFA SUPPORTS passage of the Organic Agriculture Research Act (HR2436/ S2404).



Q19 PROPOSED POSITION: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.



Q20 PROPOSED POSITION:OFA SUPPORTS animal welfare requirements as proposed in the Organic Livestock and Poultry Practices Rule (as withdrawn 2018).



Q21 PROPOSED POSITION:OFA SUPPORTS equitable and fair-market insurance programs that are accessible and relevant for all sectors of diversified organic (and transition-to-organic) producers.



Q22 PROPOSED POSITION:OFA SUPPORTS Congress to direct the Risk Management Agency (RMA) to prioritize development of additional organic price elections for crop insurance coverage, and review policies that cap Contract Price Addendums at two-times the conventional price election for any specific crop.



Q23 PROPOSED POSITION:OFA SUPPORTS allowing organic transition producers to calculate the Actual Production History Yield (APH) for acres under organic transition using the APH of other organic acres on their farm, rather than the county T-Yield for the acres under transition



Q24 PROPOSED POSITION:OFA SUPPORTS continuation of Whole-Farm Revenue Protection established in the 2014 Farm Bill and recognize the change in farm revenue after a farm has transitioned to organic. Raise the cap to 50% on increased production value under the expansion provision.



Q25 PROPOSED POSITION:OFA SUPPORTS Congress to direct the Farm Service Agency to develop organic price elections for storage loans offered. Producers will then have the ability to access working capital based on the actual value of their crops to cash flow their operations. Utilize existing organic price data developed by RMA to establish storage loan prices.



Q26 PROPOSED POSITION: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.



Q27 PROPOSED POSITION:OFA supports improvements to the Food Safety Modernization Act, providing science based and practical guidelines that are in line with organic practices and standards.



Q28 PROPOSED POSITION:OFA urges Congress to include a BFRDP funding priority for projects focused on providing organic technical assistance to beginning farmers.



Q29 PROPOSED POSITION:OFA SUPPORTS targeted outreach, training, information and technical assistance on organic farming systems, USDA organic certification and transition, and organic market development to historically under-served, minority and beginning farmers through USDA agency programs, land-grant institutions, and NGOs.



Q30 PROPOSED POSITION:OFA SUPPORTS raising the six-year payment limit from \$80K to \$450K under the Organic Initiative within the Environmental Quality Incentive Program (EQIP) making these payments equal to the rest of the EQIP program, and thereby ensuring full opportunity for organic farmers to participate in the program.



Q31 PROPOSED POSITION:OFA SUPPORTS Congress to direct USDA to recognize required organic practices within the full suite of conservation programs including the Conservation Stewardship Program (CSP) and expand CSP organic bundles to transitioning organic farmers. CSP transition bundles will assist farmers with implementing organic practices, provide technical assistance during the transition period, and offset the financial costs of transitioning.



Q32 PROPOSED POSITION:OFA SUPPORTS reform of Conservation Reserve Program (CRP) to include organic producers and producers planning to transition to organic as additional allowed applicants to be eligible to participate in CRP Transition Incentive Payments (TIP).



Q33 PROPOSED POSITION: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.



Q34 PROPOSED POSITION: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.



Q35 PROPOSED POSITION: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.

