



# National Organic Coalition

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Norman Widman, National Agronomist  
Department of Agriculture  
Natural Resources Conservation Service  
1400 Independence Avenue, SW, Room 5234  
Washington, DC 20250

## **RE: RIN-AA48**

Dear Mr. Widman:

The National Organic Coalition, (NOC) is a national alliance of organizations representing farmers, environmentalists, other organic industry members, and consumers concerned about the integrity of national organic standards. The goal of the coalition is to assure that organic integrity is maintained, that consumers' confidence is preserved and that policies are fair, equitable and encourage diversity of participation and access.

Pursuant to the USDA's Natural Resources Conservation Service (NRCS) request for public comment on how to improve the conservation practice standards published in the Federal Register on June 12, 2009 (74 FR 27995), The National Organic Coalition has submitted comments as a signatory to the comments submitted by the Organic Farming Research Foundation (OFRF). These comments were developed in a collaborative process with many members of the organic community, including several National Organic Coalition members, and they represent the work of some of the organic community's best experts.

The comments from the Organic Farming Research Foundation enumerate the deficiencies within the current NRCS conservation practice standards and make recommendations for how to address the deficiencies. We quote here from the introduction of those comments as a summary of the significance of the incorporation of organic into the NRCS Practice Standards:

“Organic producers have demonstrated the various benefits of their farming and ranching systems, from increased soil biological activity, to consistent crop yields despite weather and climatic challenges, to cleaner water in local wells, streams, lakes, rivers, and beyond. Organic farms provide nontoxic food and habitat for a wide range of threatened and

endangered species, from insects to birds, reptiles, and mammals. By definition and design, the organic ideal is management for conservation of healthy ecosystems in service of agricultural production.

“However, there is a wide spectrum of achievement with respect to the organic conservation ideal. Research, education, and development to achieve self-regulating, non-toxic farming systems are still only a small part of the national research portfolio, lagging nearly 20 years behind the growth of organic demand and marketing. As a result, a number of organic farms remain in “arrested transition,” relying on adaptation of conventional practices but substituting natural for synthetic inputs. The full resource-enhancing potential of organic agriculture is far from realized.

“NRCS has an important opportunity to advance its own mission, the goals of organic agriculture, and those of USDA’s National Organic Program (NOP). That opportunity is to develop and support farm designs, specifications, and standards of organic systems. The integration of organic principles into NRCS technical manuals and programs will achieve greater efficiency for USDA’s conservation dollars and enhance the general ecological intensification of U.S. conservation efforts. Equally important, integration into NRCS policies and programs will provide increased efficacy of the organic certification process. If pursued effectively, NRCS development of organic conservation practices will greatly help to fulfill the ideals embodied in the Organic Foods Production Act (OFPA): conservation of multiple resources and highly effective ecosystem services as the basis for meeting consumer and social demands upon agriculture, with profitable returns to farms and healthy communities.

“As currently written, the NRCS conservation practice standards are not complete, relevant, or readily accessible to organic farmers and farmers transitioning to organic production, despite the established conservation benefits of organic management and the changes enacted in FCEA.”

The National Organic Coalition appreciates participating in this review, and looks forward to working with NRCS in its continued improvement of the Practice Standards, as well as the incorporation of organic principles in to NRCS conservation programs.

Sincerely,

A handwritten signature in cursive script that reads "Liana Hoodes".

Liana Hoodes,  
Policy Coordinator