

# Pennsylvania Farm Bureau

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October 5, 2020

Jennifer Tucker  
Deputy Administrator  
National Organic Program  
United States Department of Agriculture  
1400 Independence Ave. SW  
Washington, DC 20250-0268

**Re: Comments on National Organic Program: Strengthening Organic Enforcement Proposed Rule, Docket Number AMS-NOP-17-0065; NOP-17-02**

Dear Deputy Administrator Tucker:

On behalf of Pennsylvania Farm Bureau, the state's largest general farm organization, we appreciate the opportunity to submit comments for Docket Number AMS-NOP-17-0065; NOP-17-02: Strengthening Organic Enforcement Proposed Rule. Organic producers represent a growing segment of our membership, and given Pennsylvania's proximity to large numbers of consumers and direct marketing opportunity, we expect this trend to continue. **We support the comments submitted by the American Farm Bureau Federation (AFBF) dated October 5, 2020 and ask that this support be noted as part of the comment record.** To that end, we'd like to highlight a few key areas:

- *Integrity* – Integrity of the USDA organic seal is important. We strongly urge USDA to ensure organic products of American origin and their foreign counterparts are produced and sold under the same strict standards. Provisions of the proposed rule aim to do this, in exchange for increased monitoring. We hope that these new requirements result in fewer fraudulently-labeled products sold in the United States.
- *Education and Time* – New requirements come with a learning curve. As a result, it is important that USDA provide growers impacted by this rule sufficient time, guidance and education to ensure that the regulated community understands the changes, and have time to comply, prior to the final rule going into effect.
- *Exemptions* – We support the proposed rule change which narrows the list of entities not required to hold organic certification. These exemptions should be limited, and based on activities where there is a low risk of compromising organic integrity.
- *Minimizing Fraud* – We appreciate the proposed provision to require the mandatory use of National Organic Program Import Certificate. We recommend that the 30-day timeframe for certifiers to issue certificates be shortened to maximize the potential for successful traceability. It also makes sense to align the import certification with the Customs and Border Protection deadline for uploading to the Automated Commercial Environment system.
- *Organic Fraud and Recordkeeping* – The proposed new term, “organic fraud” is a useful and should help to clarify the overall goal of the new provisions. We support improving current recordkeeping requirements as a way to prevent organic fraud. Foreign producers selling organic products in the U.S. must meet equivalent record keeping standards just like our domestic producers.

As AFBF states in their comment letter, PFB is also broadly supportive of the proposed changes, and the overall goal to strengthen organic integrity. Increasing accountability through the supply chain and minimizing opportunities for organic fraud to occur is important to making sure that American producers, operating in accordance with strict organic standards, will not be disadvantaged by those who are not.

We appreciate your consideration of Farm Bureau's comments.

Sincerely,



Rick Ebert  
President