

September 20, 2004



Mark King
Chairman of the National Organic Standards Board
Re: Biodiversity Conservation Additions to the Organic System Plan

Dear Mr. King,

In 2002, the Independent Organic Inspectors Association asked the Wild Farm Alliance (WFA) to provide educational materials for their inspector trainings to address what it means to conserve biodiversity. Since then, with project funding from the Organic Farming Research Foundation, we have collaborated with organic farmers, certifiers, inspectors, and conservationists to develop comprehensive biodiversity conservation criteria for use by organic farmers and certifiers during the certification process.

The Wild Farm Alliance and our committee (listed below) respectfully request that the National Organic Standards Board (NOSB) endorse these biodiversity conservation criteria (attached) as additions to NOSB's model Organic System Plan (OSP). Because certifiers across the country look to the NOSB and the national OSP template for guidance, NOSB's endorsement of biodiversity conservation criteria will be a critical step in establishing a common understanding and expectation. We are not seeking to rewrite the rule and are not seeking clarification. Rather, this action is important in implementing the regulation as written.

Some of the additions are included within the Natural Resources section of the OSP, while the others are proposed new sections that cover wild harvest and livestock issues not previously addressed, and that provide helpful information for the creation of maps. For background, we have also attached the *Executive Summary of Organic Farmers' and Certifiers' Guides to Conservation of Biodiversity on Organic Farms*, which is a synopsis of two supporting guides that were also developed with the help of our committee. We ask that the board refer the proposed criteria to the Policy Development Committee for consideration and development of a recommendation for action by the full board at NOSB's meeting in spring 2005.

I will be present on October 14 to speak during the Public Comment period of your fall meeting. In the meantime, if you have questions or would like additional information, please let us know. We look forward to working with you.

Sincerely,
Jo Ann Baumgartner,
WFA Project Director

Encl: Recommended Biodiversity Conservation Additions to the OSP, and *Executive Summary of Organic Farmers' and Certifiers' Guides to Conservation of Biodiversity on Organic Farms*.

List of Collaborators:

Harriet Behar, organic inspector, farmer, and educator; Stacey Carlson, Marin County Agricultural Commissioner; Scott Exo, Director, Food Alliance; Sean Feder, Inspections Operations Director, California Certified Organic Farmers; Phil Foster, Foster Ranch; Tim Franklin, Applegate River Watershed Council, and Yale Creek Ranch; Tom Gardali, Senior Biologist, Point Reyes Bird Observatory Conservation Science; Pete Gonzalves, Director of Oregon Tilth; Randy Gray, Wildlife Biologist, NRCS; Jessica Hamburger, Consultant; Dan Kent, Director, Salmon-Safe; Jim Riddle, Endowed Chair, University of Minnesota and Vice Chair of National Organic Standards Board; Margaret Scoles, Director, Independent Organic Inspectors Association; Becky Weed, Thirteen Mile Lamb and Wool Company; Sarah Vickerman, Director of West Coast Office of Defenders of Wildlife.

STEERING COMMITTEE:

Melanie Adcock
C.S. Fund

John Davis
Eddy Foundation

Michael DiNunzio
Landscape Ecologist

Dave Henson
Occidental Arts
& Ecology Center

Dan Imhoff
Watershed Media

Dana Jackson
Land Stewardship Project

Dan Kent
Salmon-Safe

Paula MacKay
Consulting Wildlife Researcher

Jamie Phillips
Eddy Foundation

Mark Ritchie
Institute for Agriculture
& Trade Policy

Vance Russell
Audubon California

Becky Weed
Thirteen Mile Lamb
& Wool Company

ADVISORY COMMITTEE:

Miguel Altieri
College of Natural Resources,
University of California

John Anderson
Hedgerow Farms

Catherine Badgley
University of Michigan

Wendell Berry
Lanes Landing Farm

Robert Bugg
SAREP
University of California

Dave Foreman
Rewilding Institute

Fred Kirschenmann
Leopold Center
Iowa State University

Winona LaDuke
White Earth Land Recovery

Frances Moore Lappé
Small Planet Project

Gary Nabhan
Center for Sustainable Environments
University of Northern Arizona

Reed Noss
University of Central Florida

Alice Waters
Chez Pansise

PO Box 2570, Watsonville, CA 95077

831.761.8408 · Fax 831.761.8103 · info@wildfarmalliance.org · www.wildfarmalliance.org

Wild Farm Alliance is a project of the Tides Center