

**FORMAL RECOMMENDATION BY THE
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
TO THE NATIONAL ORGANIC PROGRAM (NOP)**

Date: August 17, 2005

Subject: __NOSB Organic System Plan revisions to address better natural resources of the operation__

Chair: Jim Riddle
(sign)

Recommendation

The NOSB hereby recommends to the NOP the following:

Rulemaking Action: _____

Guidance Statement: _____

Other: X

Statement of the Recommendation (including Recount of Vote):

The NOSB recommends that the attached version of Section D – Natural Resources replace the current NOSB Organic System Plan, Section D.

Board vote – August 16, 2005

13 yes, 0 no, 1 absent

Rationale Supporting Recommendation (including consistency with OFPA and NOP):

Rationale provided in text of recommendation below.

Response by the NOP:

Updated 2/25/05

**National Organic Standards Board
Crops Committee Recommendation for
Modification of the Organic System Plan
Adopted by the National Organic Standards Board
August 16, 2005**

Introduction

The National Organic Standards Board (NOSB) created a model Organic System Plan (OSP) as guidance for implementation of the regulations (The Rule) of the National Organic Program (NOP). The Natural Resource section of the OSP has been modified to help implement the existing biodiversity regulations in The Rule.

Background:

The NOP rule definition of organic production includes conserving biodiversity and the preamble of the rule explicitly states, "The use of 'conserve' establishes that the producer must initiate practices to support biodiversity and avoid, to the extent practicable, any activities that would diminish it." In another section, the rule states, "Production practices...must maintain or improve the natural resources of the operation, including soil, water, wetlands, woodlands and wildlife."

The Independent Organic Inspectors Association first called attention to the fact that biodiversity educational materials and criteria were needed for their inspector trainings and requested that the Wild Farm Alliance (WFA) assist them with this effort. Through support of the Organic Farming Research Foundation and others, WFA formed a broad-base of organic farmers, certifiers and conservationists (see initial list below) to develop biodiversity criteria and supporting guides for farmers, inspectors, and certifiers.

At the NOSB's fall 2004 meeting, WFA requested that the Board approve biodiversity criteria into their model Organic System Plan. The request was sent to the Crops Committee and over the winter revisions were made. The Board then unanimously agreed to approve draft text on biodiversity conservation at their spring 2005 meeting. Further refinement occurred with assistance from the National Center for Appropriate Technology (NCAT) (see second list below).

Many certifiers have adopted the NOSB's model OSP form, even though it is not required for accreditation. The existence and use of the model forms helps bring consistency to inspection, certification, and accreditation processes. Approval of the biodiversity amendment to the NOSB's model OSP will provide transparent and predictable guidance to farmers, inspectors, certifiers, and accreditation auditors.

List of Initial 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; Jo Ann Baumgartner, Director of Wild Farm Alliance; Laura Smith, Associate of Wild Farm Alliance.

List of NCAT's Stakeholder Team:

Lisa Cone, Waterfall Hollow Farm; John Foster, Quality Assurance International; Jim Riddle, Organic Independents & NOSB; Joyce Ford, Organic Independents; Diane Collins, Midwest Organic Services Assoc.; Cissy Bowman, Indiana Certified Organic; Brenda Book, Washington State Dept. of Ag.; Katherine Withey, Washington State Dept. of Ag.; Kelly Shea, Horizon Organic; Liana Hoodes, Nat'l. Campaign for Sust. Ag.; Jo Ann Baumgartner, Wild Farm Alliance; Pam Riesgraf, Organic Valley; Kathy Turner-Cliff, Doubletree Ranch LLC; Lisa McCrory, NOFA-VT; Ann Wells, Springpond Holistic Animal Health; Keith Jones, NOP; Barbara Robinson, NOP; Mark Bradley, NOP; Holly Born, NCAT; Paul Williams, NCAT; Nancy Matheson, NCAT; Lance Gegner, NCAT; Mark Keating, NCAT; Ann Baier, NCAT; George Kuepper

Recommendation:

The NOSB recommends that the attached version of Section D – Natural Resources replace the current NOSB Organic System Plan, Section D.

NOSB vote:

Yes: 13

No: 0

Abstain: 0

Absent: 1

D. NATURAL RESOURCES:

NOP Rule 205.2 defines Organic Production as a production system managed in accordance with the Act and its regulations to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity. NOP Rule 205.200 and 205.203(a) requires that production practices maintain or improve natural resources (soil and water quality, wetlands, woodlands and wildlife) of the operation.

BIODIVERSITY MANAGEMENT

Whole Farm Biodiversity Considerations:

Does your field map include features such as hedgerows, woodlands, wetlands, riparian zones, and special habitats?

- yes no

List native plants present, and/or wildlife seen moving through farm: (note priority species) _____

What steps do you take to plan/provide for biodiversity conservation?

- understand farm's location within watershed ascertain what native plants and animals existed on the land before it was a farm learn about regional natural areas and conservation priorities work with neighbors/others to enhance biodiversity (connectivity, restoration, etc.) other* describe/explain:

How do you manage water for the needs of crops/livestock, native species and riparian ecosystems?

- plant regionally appropriate crops conserve water manage water for priority species retain/restore vegetated riparian buffers/wetlands protect/improve natural hydrology/ecological function of riparian area other*

Uncultivated Area Biodiversity:

What actions do you take to provide habitat for pollinators, insect predators, birds and bats?

- bird/bat/bee boxes hedgerows/windbreaks maintain/provide natural roosting/nesting/foraging sites other*

How are you restoring and/or protecting natural areas?

- manage for native plants/wildlife specific to the site preserve/restore wildlife corridors establish legal conservation areas native habitats not converted to farmland since certification other*

List problem invasives: _____

What actions do you take to control invasive plant/animal species, especially those threatening natural areas?

- learn about invasives use weed- and pest-free seed/planting stock/soil amendments/mulches monitor for new introductions and control immediately suppress invasives using organic methods other*

Cropland Area Biodiversity:

How do you conserve and provide habitat for wildlife?

- companion planting/intercropping crop diversity wildlife-friendly fences manage fallow fields for wildlife other*

Do you schedule farm practices to benefit wildlife?

- avoid nests during breeding season stagger mowing/tilling practices plan fields to leave food/cover for wildlife other*

Biodiversity When Livestock are Involved:

How do you protect riparian areas and sensitive habitats?

- fence without impacting wildlife control sensitive area access prevent bank erosion animals fed away from water other*

What are you doing to improve your pasture or rangeland?

- prevent overgrazing reseed trampled/eroded areas plant native pasture active grazing management system prescribed burning other*

What wildlife-friendly management practices do you use?

- guard animals grazing scheduled when predation pressure low livestock spend night in protected area circumstances of livestock death documented other* list problems with predators or other wildlife: _____

Have you assessed the farm for biodiversity problems and greatest opportunities, and developed goals an a timeline for biodiversity conservation? yes no describe/explain:

How do you monitor farm biodiversity?

- visually species counts other*

Wild Harvest Enterprises Biodiversity:

How do you maintain or improve the sustainability of the harvested species?

- harvest from stable populations minimize disruption of priority species/sensitive habitats avoid erosion allow re-establishment monitor wild crop sustainability other*

***If you check other, please explain**

Add the following boxes under the Natural Resources: Water Use: What practices are used to protect water quality?

- sediment basin compost/fertilizer stored away from water