

MEMORANDUM TO THE NATIONAL ORGANIC STANDARDS BOARD

February 23, 2022

FROM: Jennifer Tucker, Ph.D.
Deputy Administrator
National Organic Program (NOP)

SUBJECT: Work Agenda Request: Organic and Climate-Smart Agriculture

The National Organic Program (NOP) requests that the National Organic Standards Board (NOSB) facilitate public discussion and continue to work on the topic of organic farming and climate-smart agriculture. The U.S. Department of Agriculture (USDA) welcomes NOSB's input on this critical issue.

As you may know, the USDA has recently shown support for climate-smart agriculture by launching the [Partnerships for Climate-Smart Commodities opportunity](#). This grant program will finance pilot projects that provide technical and financial assistance to producers who implement, quantify, and market climate-smart practices on working lands. Organic-specific projects are eligible for the grant program.

NOP thanks the NOSB for its thoughtful letter regarding USDA Climate Change Initiatives and how organic agriculture could advance the administration's climate-smart agriculture goals. We agree that organic has great potential to reduce the generation of greenhouse gasses and increase production systems' resilience to changing climate patterns. Climate-smart practices used by organic farms include management practices that maintain or improve the natural resources of an organic farm; practices that support biodiversity; and avoidance of synthetic fertilizers.

We also appreciate your call to support new and existing organic farmers through appropriate incentives, technical assistance, and market development. We agree that organic can serve as a model for all farmers who wish to adopt practices that can mitigate climate change and increase the resiliency of production systems.

We are initiating this work agenda item to facilitate discussions about this topic across the organic community in a public and open way. We are not currently seeking recommendations for Instructions, Guidance, or Rulemaking. Rather, we ask the NOSB to explore how organic can advance in tandem with climate-smart agriculture to support our planet and our farmers. Building on the suggestions outlined in your letter, NOP is highlighting the following areas where we believe the NOSB can support climate-smart agriculture through its work with organic stakeholders. We would appreciate the NOSB's suggestions about how it might best contribute to this effort.

Demonstrating that Organic Farming is Climate-Smart Agriculture

NOP asks the NOSB to share any existing data or research that supports how organic farming helps to mitigate climate change. Your letter references research that supports this link, and we welcome more information and input from you and the organic community:

- What existing data or research support the link between organic practices and climate change mitigation?
- What research should USDA prioritize to demonstrate the efficacy of organic farming as climate-smart agriculture?

Reinforcing the Link Between Organic Farmers and Climate-Smart Agriculture

NOP asks the NOSB to help reinforce and capture the connections between climate-smart agriculture and what many certified organic farmers are already doing. This may help organic farmers better capture other incentives or more clearly align with other programs that reward or compensate farmers for climate-smart programs. It could also help transitioning farmers better understand the broader benefits of organic certification.

The following bullets highlight key questions that could serve to guide for the NOSB:

- What key practices that support climate-smart agriculture are already codified in the USDA organic regulations?
- What climate-smart organic practices should new/transitioning farmers be made aware of?
- What specific practices already documented in organic system plans support climate-smart agriculture?
- How could organic system plans and other organic recordkeeping more clearly demonstrate that organic farmers' practices support climate-smart agriculture?
- How can NOP better communicate to new and transitioning farmers that organic supports climate-smart agriculture?
- What are the barriers to capturing and reporting on organic farming benefits?
- What changes would increase the efficiency and effectiveness of organic reporting of climate-smart agriculture data, while reducing duplication of reporting?

Connecting Organic Farmers to Climate-Smart Programs

NOP encourages the NOSB to investigate how organic farmers can better connect with and capitalize on climate-smart programs, policy, and market infrastructure.

- What federal, state, or local climate-smart programs could organic farmers apply for?
- What types of crosswalk tools would most help farmers in making connections between the Organic Systems Plan and any documentation required for other climate-smart and/conservation programs?
- How can organic farmers better market their current practices as climate-smart?

- What organic practices and attributes should organic farmers highlight to help them qualify for climate-smart programs?
- How can organic farmers talk about their practices so they can benefit from the variety of federal, state, and private sector climate-smart agriculture programs?¹

Resources for Organic Farmers to Advance Climate-Smart Agriculture

NOP asks for the NOSB's help to identify available tools, resources, technical assistance, and research available to help organic farmers implement climate-smart agricultural practices. We encourage the NOSB to identify existing gaps and explore strategies to meet these needs.

- USDA already supports climate-smart agriculture through many technical assistance and incentive programs. What can be done to ensure those resources reach organic farmers?
- What types of technical assistance do organic farmers need to transition? Is this assistance available now? What type of assistance may be missing?
- How can USDA better connect organic farmers with the tools, expertise, and networks they need to successfully promote themselves as climate-smart?
- What are the most critical research needs that organic farmers could benefit from?

In summary, we believe NOSB's expertise will be invaluable in helping the current and transitioning organic community in better marketing organic's climate-smart attributes, communicating how organic supports climate-smart agriculture, and connecting organic farmers with critical programs and technical assistance.

USDA believes that investigating the above topics could have a dual benefit. First, it may help empower new and existing organic farmers to market their operations as part of the climate-smart solution. Second, it would demonstrate how organic farmers are actively serving as model practitioners of climate-smart agriculture.

NOP appreciates the opportunity to collaborate with the NOSB. We thank you in advance for your work, and we look forward to your discussion and guidance.

¹ See Appendix for a select list of federal and private programs that incentivize climate-smart agricultural practices.

Appendix:
**Examples of Existing USDA Climate Smart Agriculture Incentive
and Technical Assistance Programs**

The following list of resources provide examples of the programs offered by USDA; we welcome NOSB input on other programs that have provided useful support for the organic community.

1. Natural Resource Conservation Service (NRCS) programs:

a. Partnerships for Climate-Smart Commodities

This grant program will finance partnerships to support the production and marketing of climate-smart commodities via a set of pilot projects lasting one to five years. Pilots will provide technical and financial assistance to producers who implement climate-smart practices on a voluntary basis on working lands; pilot innovative and cost-effective methods for quantification, monitoring, reporting and verification of greenhouse gas benefits; and market the resulting climate-smart commodities.

<https://www.usda.gov/climate-solutions/climate-smart-commodities>

b. Equity Conservation Cooperative Agreements

The U.S. Department of Agriculture (USDA) is investing \$50 million in 118 partnerships to expand access to conservation assistance for climate-smart agriculture and forestry. The Equity Conservation Cooperative Agreements, administered by USDA's NRCS will fund two-year projects to expand the delivery of conservation assistance to farmers who are new to farming, low income, socially disadvantaged, or military veterans. Projects will support USDA's broader effort to address climate change and equitable access to programs.

<https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/newsroom/releases/?cid=NRCSSEPRD1868022>

c. Agricultural Management Assistance

The Agricultural Management Assistance (AMA) program helps agricultural producers manage financial risk through diversification, marketing or natural resource conservation practices. Relevant to climate-smart efforts, NRCS administers the conservation provisions, while Agricultural Marketing Service and Risk Management Agency implement the production diversification and marketing provisions. Under the conservation provisions, producers may apply for and receive financial assistance to construct or improve water management structures or irrigation structures; plant trees for windbreaks or to improve water quality; and mitigate risk through production diversification or resource conservation practices, including soil erosion control, integrated pest management, or transition to organic farming.

<https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/financial/ama/>

d. Conservation Innovation Grants

The Conservation Innovation Grants (CIG) program is a competitive program that offers grants to support the development of new tools, approaches, practices, and technologies that further

natural resource conservation on private lands. Through creative problem solving and innovation, CIG partners work to address our nation's water quality, air quality, soil health and wildlife habitat challenges, all while improving agricultural operations.

<https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/financial/cig/>

e. Conservation Stewardship Program

The Conservation Stewardship Program (CSP) helps agricultural producers maintain and improve their existing conservation systems and adopt additional conservation activities to address priority resources concerns. Participants earn CSP payments for conservation performance—the higher the performance, the higher the payment.

<https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/financial/csp/>

f. Environmental Quality Improvement Program (EQIP)

The Environmental Quality Incentives Program (EQIP) provides financial and technical assistance to agricultural producers to address natural resource concerns and deliver environmental benefits such as improved water and air quality, conserved ground and surface water, increased soil health and reduced soil erosion and sedimentation, improved or created wildlife habitat, and mitigation against increasing weather volatility.

<https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/financial/eqip/>

Climate-Smart Agriculture and Forestry EQIP Signup – 2021 Pilot and 2022 Expansion

Last year, NRCS provided \$10 million to support climate-smart agriculture and forestry through a targeted EQIP signup in Arkansas, Florida, Georgia, Michigan, Minnesota, Mississippi, Montana, North Carolina, Pennsylvania and Wisconsin. States were selected based on demonstrated demand for additional support for climate-smart practices. This pilot will be expanded through a comprehensive effort across all states and programs to support farmers, ranchers and forest landowners in fiscal year 2022.

The agency identified a sub-set of conservation practices as critical for reducing greenhouse gas emissions, sequestering carbon and ultimately mitigating the impacts of climate change. These climate-smart conservation practices are prioritized in this targeted EQIP signup period and support systems for:

- Building soil health.
- Improving nitrogen management.
- Improving livestock waste management systems.
- Enhancing grazing and pasture management.
- Improving agroforestry, forestry and upland wildlife habitat.
- Improving conservation management for rice production.

g. EQIP Organic Initiative

The National Organic Initiative, funded through the Environmental Quality Incentives Program (EQIP), is a voluntary conservation program that provides technical and financial assistance for organic farmers and ranchers, or those interested in transitioning to organic. NRCS can help

organic producers improve their operations or help producers transition to organic using a conservation plan tailored to their needs.

https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/programs/financial/eqip/?cid=nrcs143_008224

h. Agricultural Conservation Easement Program

The Agricultural Conservation Easement Program (ACEP) protects the agricultural viability and related conservation values of eligible land by limiting nonagricultural uses which negatively affect agricultural uses and conservation values, protecting grazing uses and related conservation values by restoring or conserving eligible grazing land, and protecting and restoring and enhancing wetlands on eligible land.

The Agricultural Conservation Easement Program includes agricultural land easements and wetland reserve easements.

<https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/easements/acep/#>

2) Farm Service Agency (FSA) programs:

a. Organic Certification Cost Share Program (OCCSP)

OCCSP provides cost share assistance to producers and handlers of agricultural products who are obtaining or renewing their certification under the NOP. Certified operations may receive up to 50 percent of their certification costs paid during the program year, not to exceed \$500 per certification scope.

<https://www.fsa.usda.gov/programs-and-services/occsp/index>

b. Organic and Transitional Education and Certification Program (OTECP)

Certified and transitioning organic producers and handlers may be eligible for financial assistance to cover expenses paid during the 2020, 2021, and 2022 fiscal years through USDA's OTECP. This new program is part of USDA's Pandemic Assistance for Producers initiative.

<https://www.farmers.gov/pandemic-assistance/otecp>

Other USDA Resources Related to Organic Farming, Conservation Practices, and Climate Change Mitigation

NRCS: Growing Organic (YouTube video)

<https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/organic/>

Managing Agricultural Land for Greenhouse Gas Mitigation within the United States (USDA, 2016) https://www.usda.gov/sites/default/files/documents/White_Paper_WEB71816.pdf

Transition to Organic Conservation Planning Activity 138 (CPA) Starting October 2021

The Organic System Plan Template supplements are completed as part of NRCS Conservation

Planning Activity (CPA) 138 that helps farmers who are interested in transitioning from conventional farming practices to organic production by addressing the natural resource concerns on their operation. To receive financial and technical assistance from NRCS for the completion of a CPA, it must be prepared by NRCS-certified technical service providers (TSPs).

<https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/organic/?cid=nrcseprd1387426>

National Organic Farming Handbook (NRCS, 2016)

The National Organic Farming Handbook was developed to support NRCS conservation planners and other agricultural professionals as they work with organic producers. The handbook describes organic systems and identifies key resources to guide conservation planning and implementation on organic farms. Producers and other audiences may also find the handbook useful, particularly the resources listed in various sections.

<https://directives.sc.egov.usda.gov/OpenNonWebContent.aspx?content=37903.wba>

Guide for Using RUSLE2 in Organic Systems (NRCS, 2016)

Due to the complex nature of many organic cropping systems, NRCS planners and TSPs may find the use of RUSLE2 to calculate soil loss challenging. This document provides guidance on:

- How soil loss should be calculated by selecting appropriate tillage operations.
- Planning in fields with a diversity of crops.
- Considerations for high tunnels, low tunnels and mulches.
- Incorporating cover crops in the rotation.
- Incorporating manure, compost and other soil amendments

<https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/organic/?cid=nrcseprd1387426>

Nutrient Management Plan (590) for Organic Systems Western States Implementation Guide (USDA, NCAT, Oregon Tilth, 2014)

This document is an instruction guide for creating and implementing a nutrient management plan (NMP) on certified or transitioning organic lands. An NMP for organically managed lands describes the amount, source, placement, form, and timing of the application of nutrients and soil amendments, generally by field, to meet crop nutrient needs while protecting water quality, improving soil health, and utilizing manure and other organically acceptable byproducts as nutrient sources.

<https://tilth.org/app/uploads/2015/03/Nutrient-Management-in-Organic-Systems-Western-States-Implementation-Guide.pdf>