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September, 2024

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Docket ID # AMS-NOP-24-0023

Re. CACS: Climate-Induced Farming Risk and Crop Insurance

These comments to the National Organic Standards Board (NOSB) on its Fall 2024 agenda are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers, and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

Although this does not pertain to the proposal of the Certification, Accreditation, Compliance Subcommittee (CACS) directly, we need to point out that organic can only claim to be inherently climate friendly if it is soil-based.

It is clear that crop insurance is not working for organic farmers. Many organic farms are highly diversified—indeed diversity is a goal and principle of organic farming. Organic farmers adjust practices like timing in ways that may be viewed as “poor farming practices” among chemical-intensive farmers and the system that supports them. Indeed, petrochemical pesticide and fertilizer use by lenders and insurers are viewed as a tool to protect their investment, despite their contribution to costly catastrophic events affecting health, biodiversity, climate and ultimately ecosystem services. Many organic farmers sell directly to consumers, so payments tied to wholesale prices fail to reimburse their losses. These facts make organic farming a poor fit for current crop insurance programs. As stated by the CACS last fall,

Organic farmers manage their risks through improving soil organic matter, rotating crops, and diversifying their operations (Hanson et al., 2004). Improving soil health is viewed as on-farm risk management by many organic producers (Snyder et al., 2022). Other types of risk are price risk related to market access and other market factors. Some producers, especially those growing specialty crops, manage market risk by creating a CSA or by marketing to multiple outlets (Snyder et al., 2022).

The safety net provided by crop insurance could be beneficial, particularly in this age of climate uncertainty. However, insurance in general, and crop insurance in particular, is an inadequate response to the crises that we face. The insurance industry has recognized this by pulling out of markets—such as insuring homes vulnerable to hurricanes, floods, and fires. These threats—which were once considered rare events—are now routine occurrences. While people need help in a crisis, what is really needed is an approach that recognizes the underlying causes of the disasters.

We need to go beyond the mindset that environmental disasters like severe storms, drought, fire, and floods are anomalies that we can get past. We cannot insure our way out of these sustained predictable events. While the insurance model helps to address crises, it allows us to ignore the causes.

In the case of agriculture, organic agriculture must be recognized as a public good and encouraged through public funding of an insurance mechanism that not only makes organic farmers whole in the case of a disaster, but also incentivizes chemical-intensive farmers to abandon the methods that cause the climate, biodiversity, and public health crises in favor of organic methods that reduce the dangers. In this context, insurance for organic farmers must recognize their value in working with natural systems and the resulting ecosystem services that contribute to resilience during droughts, infestations, or other adverse human-induced events. Instead of subsidizing farming methods and materials that create catastrophes, public policy should underwrite insurance for organic farmers, thus incentivizing more farmers to make the transition to organic. The cost should be borne by the purveyors of petrochemical fertilizers and pesticides who benefit from a system dependent on their products.

We support suggestions made by the CACS. In particular, [T]here is still work to be done to level the playing field for organic producers. At a minimum, by offering risk management options that do not *disincentivize* the transition from conventional production to organic, the opportunity to participate in the organic marketplace will expand to more producers. Additionally, those certified producers will benefit from more robust, equitable risk management options. Further refining organic crop insurance options will help address the farming communities' concerns.

We agree with the quoted public comment, “We encourage RMA, NOP, and the NOSB to continue to work with organic stakeholders to develop further new crop insurance tools that serve the needs of diversified organic growers (and transition-to-organic producers) and a system that recognizes the robust and extended rotation both during transition and as organic producers.” Is it possible for USDA to hire organic farmers to assist with crop insurance, to avoid repeatedly receiving the feedback that crop insurance doesn’t work for organic farmers?

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, written in a professional style.

Terry Shistar, Ph.D.
Board of Directors

