



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

October 19, 2026

U.S. Department of Agriculture
Agricultural Marketing Service
National Organic Program
1400 Independence Avenue, SW
Washington, D.C. 20250-0268

Re: Agency Information Collection Activities; Proposals, Submissions, and Approvals: National Organic Program; Strengthening Organic Enforcement [AMS-NOP-26-1321]

Dear Madam/Sir,

These comments 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 U.S. states, Commonwealths, territories, the District of Columbia, and the world.

We are writing in response to the U.S. Department of Agriculture (USDA) Agricultural Marketing Service's (AMS), through its National Organic Program (NOP), request for an extension and revision of the information collection titled "National Organic Program: Strengthening Organic Enforcement (SOE)."¹ This extension is said "to allow AMS adequate time to add the activities covered under this Strengthening Organic Enforcement... so that it may continue to fully implement organic regulations and enforcement."¹

While Beyond Pesticides supports the continued collection of information necessary to implement and enforce the National Organic Program's Strengthening Organic Enforcement requirements, the extension should not be treated as a substitute for action. Beyond Pesticides endorses continuous improvement of organic standards, including scrutiny of substances allowed in organic production.

Enforcement of Organic Standards

Organic agriculture is a holistic solution to the concurrent crises regarding public health, biodiversity, and climate. As the harm to public health and ecosystems associated with petrochemical pesticide and fertilizer use continues to be documented in the scientific

literature, a national action is calling for standards governing organic land management practices to be protected and strengthened.^{2,3}

Organic maintains a unique place in the food system because of its high standards and the ongoing opportunity for continuous improvement through transparency and public involvement. As such, credible certification and enforcement are essential to ensuring that the organic label retains its meaning.

In extending the current approval for one year and asking to continue collecting the records and documentation needed to enforce organic certification requirements, including documentation for imported organic products, USDA is ensuring that effective recordkeeping and supply-chain traceability can prevent fraud, maintain accountability, and protect public trust in the organic label. These steps are all crucial in implementing the existing Strengthening Organic Enforcement rule and upholding organic integrity.

The issue, however, is that continuing paperwork requirements are not the same as ensuring effective enforcement. Recordkeeping must be translated into action. As an example, USDA must use supply-chain documentation to identify suspicious transactions, investigate violations, and prevent fraudulent organic claims.

Summary

Beyond Pesticides and others—including organic and regenerative organic farmers and advocates—have long argued that the Environmental Protection Agency (EPA) has failed to consider the viability, productivity, and profitability of organic practices and product alternatives to conventional pesticides. There is wide body of scientific literature documenting adverse effects of toxic pesticides, while there are commercially available alternative management practices and products, as defined by the *Organic Foods Production Act* (OFPA) and implemented by the USDA's National Organic Program, that offer a holistic solution. Organic management practices and organic compatible products eliminate the hazards (and risks) that EPA is accepting.

Beyond Pesticides urges USDA to ensure that these information-collection requirements are implemented in a manner that supports meaningful enforcement, timely investigation of suspected violations, and effective verification of organic claims. Documentation should be complemented by appropriate inspections, supply-chain traceability, and pesticide-residue testing where warranted. USDA should also ensure that the administrative burden associated with these requirements does not undermine the resources available for effective oversight and enforcement. Maintaining the existing information collection is an important element in protecting organic integrity, but it must remain part of a broader commitment to rigorous enforcement and continuous improvement of organic standards.

Thank you for your consideration of our comments.

Respectfully,

A handwritten signature in black ink, appearing to read 'Sara Grantham', with a stylized, flowing script.

Sara Grantham
Science, Regulatory, and Advocacy Manager

¹ United States Environmental Protection Agency (2026) Agency Information Collection Activities; Proposals, Submissions, and Approvals: National Organic Program; Strengthening Organic Enforcement. Available at: <https://www.regulations.gov/document/AMS-NOP-26-1321-0001>.

² Beyond Pesticides (2026) Organic Integrity Is Up for Review before Public Board that Manages Standards and Practices, Deadline Oct 1. Available at: <https://beyondpesticides.org/dailynewsblog/2026/09/organic-integrity-is-up-for-review-before-public-board-that-manages-standards-and-practices-deadline-oct-1/>.

³ Beyond Pesticides. Pesticide-Induced Diseases Database. Available at: <https://www.beyondpesticides.org/resources/pesticide-induced-diseases-database/overview>.