



ORGANIC FARMERS ASSOCIATION

Organic Farmers Association
PO Box 709 Spirit Lake, IA 51360

To: Erin Healy, Director, Standards Division
USDA National Organic Program
1400 Independence Avenue SW
Room 2642-South, Stop 0268
Washington, DC 20250-0268

Docket number: AMS-NOP-26-1321; NOP-26-08, *OMB Control Number:*
0581-0321 Submitted electronically on October 19, 2026

Dear Ms. Healy,

Thank you for the opportunity to provide public comment concerning the notice in the Federal Register titled: National Organic Program: Notice of Intent to Extend a Previously Approved Information Collection (Strengthening Organic Enforcement) (2026), *OMB Control Number:* 0581-0321.

The Organic Farmers Association (OFA) is led and controlled by domestic certified organic farmers, and only certified organic farmers determine our policies using a grassroots process. We provide a strong, authentic voice for domestic certified organic farmers.

Year after year, OFA members have ranked improving organic integrity among their top priorities. Our farmer members have developed 34 distinct policy positions regarding organic integrity. OFA strongly recommends extension of this previously approved *Strengthening Organic Enforcement* information collection (0581-0321) so that AMS may continue to fully implement the related requirements and information collection.

Traceability measures such as *import certificates, inspector training and qualifications, and review of foreign conformity systems* are essential to protecting organic integrity. The collection of information through SOE continues to be necessary for the proper performance of the enforcement functions of the NOP.

Risk-Based Implementation is Needed

Organic is a growing sector of the U.S. agriculture system, with tremendous potential to help family farms flourish, revive rural communities, and protect public health. Improving the economic viability of smaller farms has been a major strength of the organic sector and an important component of building a resilient domestic food supply. However, transitioning to and

maintaining organic certification requires significant investment of money and time for recordkeeping. The required recordkeeping can be burdensome for small farmers and, in some cases, deters small farms from transitioning to organic, including those already using organic practices.

OFA farmers are interested in policy changes that would ease the burden of record-keeping on small, low-risk operations such as small farms with a history of compliance and a simple supply chain while still ensuring adequate oversight and fraud prevention measures are in place for higher-risk operations with long and complex supply chains across multiple countries and certifiers. Using risk assessment to shift most oversight and additional record-keeping requirements to high-risk operations would let NOP use its resources most efficiently and effectively.

To use resources effectively, NOP must issue clear guidance on how it will conduct risk assessments, how it will define low- and high-risk operations, and how it will shift most oversight to higher-risk operations. NOP should consider allowing simpler certification documentation and, possibly, remote inspection every other year for low-risk operations to reduce certification costs and paperwork burden. Continuing work with certifiers to reduce paperwork duplication and form-refilling during certification renewals would also reduce the recordkeeping burden for less complex operations that run similarly year to year. Additionally, improving and simplifying the process for farmers to document and present fraud concerns to the NOP and USDA would be helpful.

One area of risk assessment that is particularly important relates to section 205.403 of the Strengthening Organic Enforcement Rule, which requires certifiers to conduct unannounced inspections of at least 5% of the operations they certify annually. We recognize the importance of codifying a minimum number of unannounced inspections to ensure the integrity of the organic certification system. At the same time, the NOP must recognize the significant burden a second annual inspection places on smaller organic farms and ensure unannounced inspections are not selected randomly, but applied to higher-risk operations that could benefit from a second look.

Many organic-certified farms in the country are small-scale, focusing on specialty crops for direct markets and local restaurant/institution sales, where the farm owner and family provide the primary labor and manage operations. For these farms, a certification inspection disrupts farm work for most of a day, which can be significant and expensive. If these small organic farms also pose a low risk of organic fraud, then subjecting them to three on-site inspections in 13 months is inequitable and a poor use of resources.

Moreover, because smaller farms contribute less to the volume of organic crop and livestock production, random inspections of these operations will have less impact on the organic marketplace, already making them a low risk for marketplace fraud. Certifiers should focus unannounced inspections on farms and handlers with a history of complaints or noncompliance, and on those operating in markets with a higher risk of organic fraud and where fraud could

have a larger impact due to the volume of product dispersed in the marketplace. Therefore, section 205.403 should be revised to require certification agents to establish parameters for assessing the risk of fraud that operations present, and to select operations for unannounced inspections that present this higher risk profile.

We appreciate the opportunity to provide feedback on this critical issue, and look forward to continued conversations. If you have questions or need more information, please contact our policy director, Lily Hawkins, lily@organicfarmersassociation.org, (267) 231-2216.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kate Mendenhall', with a stylized, cursive script.

Kate Mendenhall
Executive Director