

Protecting Native Ecosystems

Eliminating the Incentive for Conversion to Organic Production



March 2018
Issue Brief

www.WildFarmAlliance.org

OUR WORK



Empowering Farmers Connecting Consumers Protecting Wild Nature

Since 2000, Wild Farm Alliance has initiated policies that support farm stewardship, educate farmers about on-farm biodiversity conservation, and assist them with its practical implementation.

Our mission is to promote a healthy, viable agriculture that protects and restores wild nature.

Our work is centered on engaging and empowering those involved in the food and farming movement, including everyone from farmers to consumers.

Learn more and get involved: www.WildFarmAlliance.org

Pushing for a New Rule

The National Organic Standards Board (NOSB) just published a proposed rule recommendation to the National Organic Program. It mirrors what Wild Farm Alliance proposed in fall 2017 and what you helped to promote. This new rule will protect Native Ecosystems from conversion overnight to organic production.

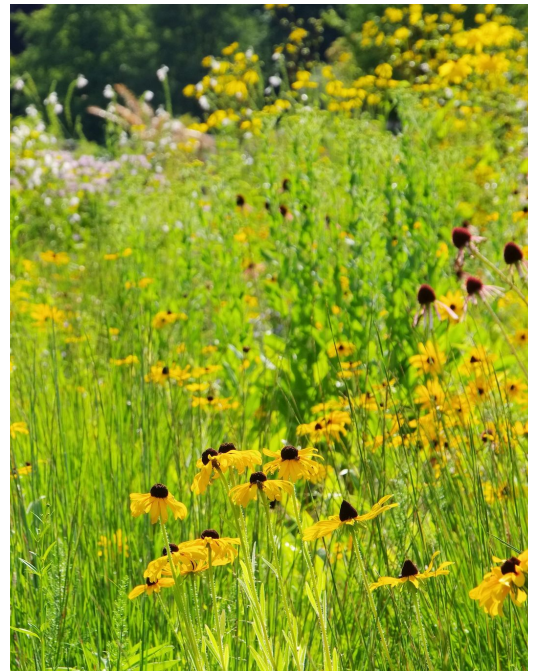
With this new regulation, the NOSB will incentivize the transition of non-organic farms while minimizing the loss of lands with important habitats from conversion.

These Native Ecosystems are necessary to support declining and rare species today and a hundred years from now, when there will be much less available due to increased human populations and climate change.

Until now, certification of Native Ecosystems has been extremely unfair to the organic producers who have worked hard and made significant financial commitments to convert non-organic farms into organic production.

Organic agriculture is built on the philosophy of caring for the Earth. The organic label must protect these Native Ecosystems for the future - the NOSB should not do anything less.

OUR GOAL



**Please take action today and help us push through to the final finish line.
Your voice is more important than ever right now!**

COUNTERING THE ARGUMENTS



Argument: It is hard for beginning farmers to find land to farm.

Counter: Too often, beginning farmers end up with lands that have never been farmed because they are too steep or wet, which sets them up to fail. There are 37 programs in the US that help beginning farmers obtain land
<https://www.farmtransition.org/resources/>

Argument: Organic producers cannot find land to expand their operations.

Counter: 99% of the agricultural land in the world is farmed conventionally. They should be transitioning **this land** to organic production.



Argument: Transitioning land is expensive

Counter: More and more resources are becoming available to producers transitioning to organic.

- NRCS Conservation Action Plan 138 - helps producers implement a system of conservation practices for organic.
- Companies, like General Mills and Kellogg, are supporting their producers as they transition to organic.

Argument: It will be hard for organic operations to adjust to this rule.

Counter: Areas that are already converted could be grandfathered into the rule. Since it will take a few years to enact, organic businesses will have time to make adjustments. Since many countries already have standards that don't allow conversion, this rule change won't affect their producers.



TAKE ACTION

In just a couple of weeks, the full NOSB (not just the subcommittee) will be voting to approve this rule recommendation.

Whether or not you have submitted comments in the past, we now need to urge all of the NOSB members to push this recommendation forward.

Below are taking points to make when submitting comments. Visit www.WildFarmAlliance.org/submit_comments to learn more.



Tell the NOSB you support the motion to approve the two-part proposal to Eliminate the Incentive to Convert Native Ecosystems to Organic Production. The NOSB's leadership will ensure the USDA organic label provides critical protections for Native Ecosystems, and the integrity of the National Organic Program will be preserved.

1. Define "Native Ecosystems" in a way that an assessment can be made based on plant species present in natural and semi-natural vegetation types.



2. Require a timeframe of ineligibility, ensuring that a site supporting a Native Ecosystem cannot be certified for organic production for a period of 10 years from the date of conversion.

Pass the two-part proposal, then encourage Guidance that will ensure uniform compliance with the Native Ecosystems definition and the period of converted lands not being eligible for certification.

COMMENTS DUE APRIL 4, 2018

Your comments will ensure organic agriculture today protects habitat for countless species now and in the future!

Join with Wild Farm Alliance and thousands of other organic and conservation advocates to tell the NOSB to approve this rule recommendation today.

www.WildFarmAlliance.org/submit_comments

Eliminating the Incentive for Conversion of Native Ecosystems to Organic Production



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Empowering Farmers, Connecting Consumers, Protecting Wild Nature

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INTRODUCTION

Why a New Rule?

While certified organic agriculture is an ecological management system that promotes and enhances biodiversity, it offers no environmental protections prior to certification.

Wild Farm Alliance (WFA) has worked for over a decade to improve biodiversity conservation in the National Organic Program (NOP).

Most recently, we and our partners influenced the National Organic Standards Board (NOSB) to publish proposed language for a rule change that would protect native ecosystems from being converted to production.

But, in order to truly protect biodiversity, the proposed language needs to be fixed.

And we need your help!

NOP's three-year waiting period for land to be free of prohibited substances unintentionally incentivizes producers to convert native ecosystems to agricultural production on one day, and become organically certified the next.

An updated version of the proposed rule would take the incentive away.

Wild Farm Alliance and organic advocates want organic agriculture to grow - to see more than 1% of agriculture to be certified. However, it is imperative for organic to grow in a sustainable way that embraces the integrity of the label.

This proposed rule change is a positive step in the right direction, with the goal to redirect growth to transitioning conventional acres to organic acres.



Increasing the Scope and Defining Native Ecosystems

The NOSB's proposed rule will be almost meaningless if it is not fixed by increasing the scope, and defining Native Ecosystems.

Agriculture is predicted to encroach on natural ecosystems by nearly a third with croplands increasing more than 20% and pasturelands more than 10% by 2050 (<http://bit.ly/2mTn7kl>).

This along with other development, energy and mining pressure could result in half of the world's biomes (different types of habitat) being converted.

The biggest land conversion will be seen in less developed continents. In just 35 years, conversions in South America could double, and in Africa could triple.

We also cannot allow native ecosystems to be converted when we are in the midst of a sixth mass extinction of plants and animals on Earth.

A new NOP rule is needed that will protect the native ecosystems from being converted to organic production - preserving these lands is crucial in order to protect natural processes and wildlife habitat that will continue to shrink well into the future... **But we are not there yet.**



The proposed rule would only protect native ecosystems that have never been cultivated or grazed. In regions of the world where livestock can be raised, there is very little land left that hasn't been grazed.

Many areas that have been grazed or cultivated a 50-100 years ago have recovered today.

This critical issue will save countless wildlife and native plants, and preserve the integrity of organic agriculture.

Your voice will make a difference!

Learn more and get involved: www.WildFarmAlliance.org

What Can You Do?

Your Voice Matters!

We are thrilled the NOSB is tackling this issue, but adding a new rule is a big deal.

It is critical that the proposed NOP rule change clearly states the intent – To incentivize the transition to organic production of farms that have had prohibited materials applied, while minimizing the loss of lands with important habitats from conversion.

These native ecosystems will be necessary to support declining and rare species today and a hundred years from now, when there be much less available due to increased human populations and climate change.

We are getting closer to what is needed. Please help us reach the finish line.



What needs to be changed: (short version)

1. Don't narrow the scope of Native Ecosystem protection to land that has never been cultivated or grazed because that will make the rule almost meaningless.
2. Define Native Ecosystems in a way that plants can be used to systematically classify and describe ecosystem types.
3. I support the comments of the Wild Farm Alliance on this issue and hope you will take their suggestions seriously.

Join with Wild Farm Alliance and thousands of other organic and conservation advocates to support changes to the proposed rule language.

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What needs to be changed:

(longer version)

1. Don't narrow the scope of Native Ecosystem protection to land that has never been cultivated or grazed because that will make the rule almost meaningless. Delete "grazed or cultivated." Prior agricultural land uses can be difficult or impossible to detect, and the inclusion of these words will lead to confusion and disagreement.

2. Define "Native Ecosystems" in a way that an assessment can be made on species present. For areas on land, natural and semi-natural vegetation types are assessed.

3. "Conversion" should not be tied to "crop or livestock production." Whether the conversion of a Native Ecosystem was directly because of agriculture or some other reason such as development, the time period between conversion and certification should still apply.

4) Delete "crop or livestock" and just say "organic production." While conversion will predominately be to crops and livestock production, this rule should not omit other types of operations.

5. Change the rule language to:

A site supporting a native ecosystem cannot be certified for organic production as provided for under this regulation for a period of 10 years from the date of conversion.

Native Ecosystems: These sites retain dominant and characteristic species. The composition of species reflects spontaneous natural processes, such as biogeography (e.g. dispersal of plants and animals), the geophysical constraints (e.g. soil type), and natural disturbance regimes (e.g. wind, fire, and water flow). On land with natural vegetation, any past human influences are not readily recognized in the field. For semi-natural vegetation, past human influences may have significantly altered vegetation composition or structure over 50-100 years ago but these have recovered. Sites will tend to have not been previously cultivated, cleared, drained or otherwise irrevocably altered.
