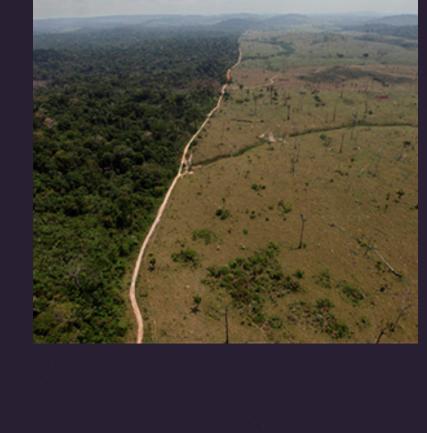
Eliminating the Incentive for Conversion of Native **Ecosystems to Organic** Production



Empowering Farmers, Connecting Consumers, Protecting Wild Nature

assisted them with its practical implementation. Our mission is to promote a healthy, viable agriculture that protects and restores wild nature. Our work is

stewardship, educated farmers about on-farm biodiversity conservation, and

Since 2000, Wild Farm Alliance has initiated policies that support farm

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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

INTRODUCTION

Why a New Rule?

certification. Wild Farm Alliance (WFA) has worked for over

While certified organic agriculture is an

promotes and enhances biodiversity, it offers

ecological management system that

no environmental protections prior to

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

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

But, in order to truly protect biodiversity, the

Wild Farm Alliance

production.

next.

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

An updated version of the proposed rule

Wild Farm Alliance and organic advocates

However, it is imperative for organic to grow

want organic agriculture to grow - to see more than 1% of agriculture to be certified.

in a sustainable way that embraces the

would take the incentive away.

integrity of the label.

organic acres.



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

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

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

croplands increasing more than 20% and pasturelands more than 10% by 2050

This along with other development, energy

(http://bit.ly/2mTn7kl).

Earth.

The NOSB's proposed rule will

continue to shrink well into the future... But we are not there yet.

This critical issue will save countless wildlife and native plants, and preserve the integrity of organic agriculture. Your voice will make a difference!

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

todav.

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The proposed rule would

ecosystems that have never

only protect native

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What Can You Do?

Wild Farm Alliance

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

We are getting closer to what is needed. Please

but adding a new rule is a big deal.

habitats from conversion.

Your Voice Matters!

We are thrilled the NOSB is tackling this issue,

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.

help us reach the finish line.

changes to the proposed rule language.

1. Don't narrow the scope of

land that has never been

Native Ecosystem protection to

cultivated or grazed because that

uses can be difficult or impossible

these words will lead to confusion

to detect, and the inclusion of

and disagreement.

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

systematically classify and describe

way that plants can be used to

ecosystem types.

What needs to be changed: (short version)

- Join with Wild Farm Alliance and thousands of other organic and conservation advocates to support

3. "Conversion" should not be tied

conversion of a Native Ecosystem

to "crop or livestock

production." Whether the

between conversion and

certification should still apply.

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will make the rule almost was directly because of agriculture meaningless. Delete "grazed or or some other reason such as cultivated." Prior agricultural land development, the time period

4) Delete "crop or livestock" and just say "organic 2. Define "Native Ecosystems" in a production." While conversion will way that an assessment can be predominately be to crops and made on species present. For areas livestock production, this rule on land, natural and semi-natural should not omit other types of vegetation types are assessed. 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.

3. I support the comments of the Wild Farm Alliance on this issue and hope you will take their suggestions seriously.

Wild Farm Alliance What needs to be changed: (longer version)

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