

# The Issues with the National Organic Program

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## Abstract

The National Organic Program was developed to help consumers gain confidence in the goods they were buying, and to give farmers recognition for their efforts to support pesticide-free growing. Despite these good intentions, the way by which farmers are expected to go about certification is highly flawed. Rather than going through with certification, many small pesticide-free farmers choose to remain uncertified even though they are eligible. Out of all the farms that have taken the 2014 NOFA Farmer's Pledge, a pledge to follow organic standards in growing food, 75% of them are not certified organic. This research aimed to determine the barriers preventing these farms from going through with certification. Although the preliminary expectation was that costs involved with certification were the largest preventative force, it was actually the amount and difficulty of the paperwork to file for organic farming certification. Although small farmers have different resources available to them in comparison to large-scale farmers, the paperwork for both parties is the same. In order to increase the number of small farmers that gain certification, it is recommended that the National Organic Program adjust the paperwork to be more relevant and easier to complete, without watering down the organic standards presented by the U.S. Department of Agriculture. Until this is accomplished, other alternatives may be considered, such as developing an internship program that sends students from local colleges and universities to assist farmers in filling out the paperwork, or creating computer software that simplifies the forms and the filing process.

## Introduction

The National Organic Program (NOP) was created in 1990 as a way to regulate and define what "organic" meant. In previous years, there was neither a universal definition nor a set of standards, leading to much discretion and debate between both the consumers purchasing these goods and the producers themselves. The Organic Foods Production Act of 1990 established the first national set of standards for the production of organic goods, and allowed the United States Department of Agriculture (USDA) to create the National Organic Program to administer the regulations set forth by the USDA (Baier & Ahramjian, 2012).

As part of the USDA regulations, producers and handlers of organic crops and other food products are required to go through the process of organic certification. This process is performed by a USDA-accredited certifying agent, which may be a State, private, or foreign organization. The farm or other relevant party being certified has the freedom to choose who will certify them. This decision is based on distance from the certifying agent, their fee structure, and any additional member services they may provide. The application is submitted to this certifying agent, and must contain several materials; these include a comprehensive description of the farm or business being certified, a history of all substances applied to the land within the last three years, the names of the organic products grown, raised, or processed, and a written Organic System Plan (OSP) outlining practices and substances to be used (Baier & Ahramjian, 2012).

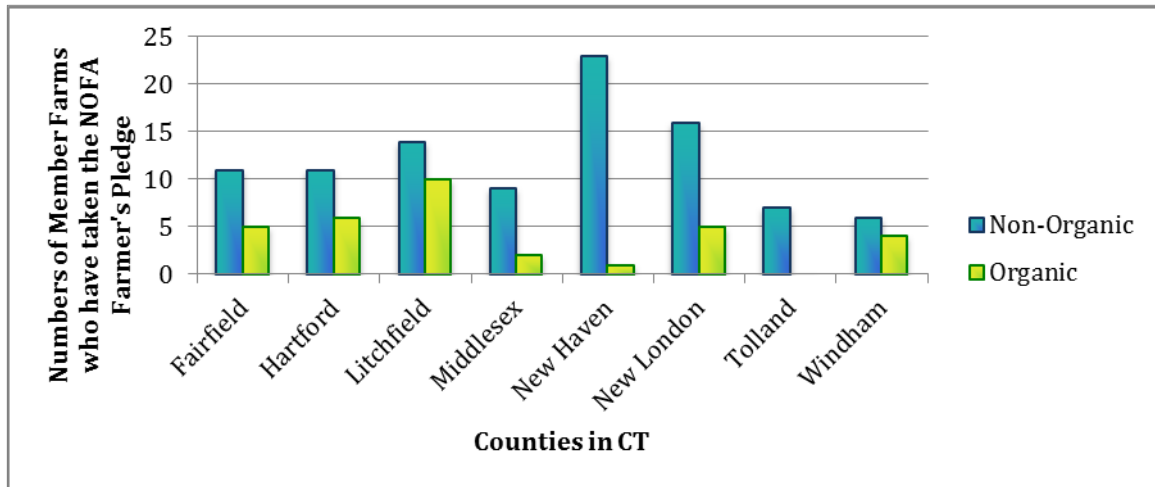
Once submitted, the certifying agent reviews the application materials to ensure that all practices comply with the organic standards set by the USDA. The next step is for an inspector to come out to the site to examine the applicant's operation. This will ensure that the Organic System Plan provided by the applicant is truthful and

includes all actual processes. The inspector will relay his or her findings back to the certifying agent in order to complete the review of this applicant's practices. If the applicant does meet all the requirements of the USDA, their farm or business will receive certification (Baier & Ahramjian, 2012).

Unfortunately, there are a high number of farms in Connecticut that choose not to become certified. These farms are eligible for certification as they meet the strict guidelines of the USDA by not using synthetic pesticides or genetically engineered crops. Still, they are not willing to go through with organic certification. Instead, these farmers are members of the Northeast Organic Farming Association (NOFA), and have taken NOFA's Farmer's Pledge. This pledge is a one-page document, which lays out the duties of a responsible farmer, including not using synthetic pesticides, valuing biodiversity and soil health, minimizing erosion, and conserving natural resources. A farmer who would like to join NOFA simply needs to sign this document and send it in—there are no inspections or fees. These farms then go into the yearly NOFA Farms & Food Guide, a list of all farms and businesses that have signed the Farmer's Pledge (CT NOFA).

In the 2014 NOFA Farms & Food Guide, 130 farms completed the Farmers Pledge. Out of these 130 farms, only 25% of them held organic certification, as seen in Figure 1. Given that the practices on each of these NOFA farms accurately represent the standards of the Farmer's Pledge, all of these farms have the ability to become organic certified. Having 97 out of 130 farms choose to be pesticide-free and follow organic practices but not apply for certification indicates that there is a barrier preventing them from doing so.

The goal of this project was to determine the barriers preventing small, pesticide-free farms from applying for organic certification. These farmers are



**Figure 1:** A graph of CT NOFA Farmer's Pledge members comparing the number of certified organic farms to the number of uncertified farms across each Connecticut County.

qualified to go through with the paperwork and would not need to alter the way they run their farms, yet a large percentage of them remained uncertified. There were several possible outcomes of this research; the barriers could be related to money, paperwork, lack of knowledge, or perhaps another unknown variable.

### Materials & Methods

Due to the nature of the topic, a multi-disciplinary literature review was conducted on the benefits of organic farming in order to better understand farmers' reasoning for cultivating this way, along with some of the challenges these farmers may face as compared to conventional farmers. Additionally, the current certification process was reviewed through the National Organic Program, including analyzing the required paperwork and fee schedule.

Next, numerous farms from across the state of Connecticut were contacted. These farms were selected

based on their membership with NOFA and The Farmer's Pledge. An email was sent to each of the selected farms summarizing the project and inquiring to set up an interview to discuss farming practices. Farms that responded to the email were interviewed in-person. Topics such as types of crops grown, size of farm, pesticide-free pest control, and the possibility of becoming certified organic were all discussed. This was continued for several weeks in order to make time for each farmer.

Finally, the results of the interviews were analyzed and some alternatives to the National Organic Program were researched. Any suggestions proposed by the farmers regarding the NOP certification process were taken into consideration and looked into. A conclusion was drawn about the barriers preventing pesticide-free farmers from becoming certified and how these barriers could be overcome.

**Table 1:** Fee Schedule for Baystate Organic Certifiers

Gross Income	Application Fee	New Operation Fee	Total Fees	Fees after Reimbursement
\$0-\$5,000	\$315.00	\$150.00	\$465.00	\$116.25
\$5,000-\$10,000	\$370.00	\$150.00	\$520.00	\$130.00
\$10,000-\$20,000	\$420.00	\$150.00	\$570.00	\$142.50
\$20,000-\$30,000	\$580.00	\$150.00	\$730.00	\$182.50
\$30,000-\$40,000	\$685.00	\$150.00	\$835.00	\$208.75
\$40,000-\$50,000	\$790.00	\$150.00	\$940.00	\$235.00
\$50,000-\$75,000	\$895.00	\$150.00	\$1,045.00	\$261.25
\$75,000-\$100,000	\$1,080.00	\$150.00	\$1,230.00	\$307.50

## Results

At the conclusion of the interviews, it was clear that the main barrier was paperwork, rather than money as originally suspected. While the initial costs of certification can be high for a small farmer (ranging between \$400-\$700 depending on exact income of the farm), the United States Department of Agriculture will reimburse up to 75% of the total amount. This means that fees after reimbursement run closer to \$150-\$200, with yearly re-certification rates being even lower. Table 1 shows the fee schedule for Baystate Organic Certifiers, a private organization that handles the certification of farms in the Northeast region, including CT, MA, ME, NH, NY, NJ, RI, and VT.

On the other hand, the paperwork proved to be a greater challenge than it was worth. At an extensive 14 pages, this paperwork requires more time and attention than small farmers are able to give. The information required in the paperwork is much more relevant to farms of a larger scale. Additionally, the farmers questioned did not see the need to persevere through the paperwork since they were only selling their goods at farmers markets. This allowed them to have a one-on-one interaction with their customers to inform them of their farming practices. Customers cared more about their produce being grown without pesticides than they did about it having an organic label. Still, additional studies would need to be done to gain a better sense of consumer behavior, and whether an organic label would make a difference in sales.

## Discussion

Lack of knowledge on sustainable farming practices was quickly ruled out as being a factor limiting the certification of small farmers; all farmers were members of The Farmer's Pledge and understood the benefits of producing crops without the use of pesticides. Still, each farmer had his or her own specific reason for choosing to be pesticide-free. One farmer interviewed in Madison, CT knew this was the safest choice for herself and her family. Their house lies in the center of their 10 acres of land, a small part of which is used in producing crops. This is a trend that continued with the other small farmers visited—farmers and their families are living and working on the same property. Another farmer in Cheshire, CT expressed the same concerns—his  $\frac{3}{4}$  cultivated acres, seen in Figure 2, sits adjacent to his home, where he and his family reside. Of course, there are also economical reasons to pesticide-free farming; this farmer raised the point that it's what customers want. There is a demand for local food grown in the most environmentally conscience way, and his small farm looks to fill that need.



Figure 2: 3/4-acre farm in Cheshire, CT

Other farmers say farming without pesticides is just the right thing to do. One particular farmer in Northford, CT has been in the business of organic farming for 25 years, joining the organic movement at the very beginning. His two acres of cultivated land produce an astounding 35 different varieties of vegetables, in addition to an assortment of herbs and flowers. One of his high tunnels used for growing tomatoes is seen in Figure 3. Unlike the first two farms in Madison and Cheshire, this farm had been certified for a period of five years until the farm manager chose to let the certification expire rather than continuing to renew it. There were several reasons given for doing so; most importantly to him was the change in the definition of “organic.” At the start of his farming career in 1975, organic was used to define farming practices which had a strong set of moral values, regarded sustainability, and included a sense of community. The strict present-day definition of organic did not exist until the start of the National Organic Program in 1990. While this was better for the consumer as standards were made clear, it was impossible to regulate the real things that organic stood for. Instead of valuing community and sustainability, organic now was a list of rules telling farmers what they could or could not do. Still, to gain some sort of recognition for his farming practices, this farmer chose to become certified. As years went on, large Agribusinesses such as Kellogg's and General Mills began buying into organic, leading to the standards becoming even more watered down. To escape the politics and stick with what he called the true meaning of organic, this farmer chose to let his certification expire and look into other alternatives.



**Figure 3:** Certified Naturally Grown farm in Northford, CT

The alternative he found was Certified Naturally Grown (CNG). While this program encompassed all the strict requirements of the National Organic Program, it had a few extra guidelines. Because it was created with small farmers in mind, it cuts back on the strenuous paperwork and keeps fees to a minimum. In fact, CNG only provides suggested payments—they encourage paying only what you can—and even have a scholarship fund for farmers who are just getting started and cannot afford to put up the fees. It also differs in that it is not hosted by a private certifier, but rather by other farmers in the community. This is a beneficial piece in preserving the original definition of organic. Farmers have a connection with one another and can share best farming practices, most successful crops, etc. Certified Natural Grown farms also consent to allowing customers to visit the farm and inspect practices themselves—something not touched upon in the organic program.

This farmer in Northford, CT was not the only farmer to leave behind organic in favor of Certified Naturally Grown—a second farm from Madison, CT did so as well. Although his decision was not necessarily politically driven, this farmer grew tired of putting in hours upon hours of work toward applying for certification and receiving little benefit from it. Like many of the other farmers questioned, he noted that it just did not make a difference in his sales. Once again, consumers valued their produce coming from a local, reputable source rather than it having the organic paperwork to back it up. Certification only entailed extra labor and costs. A farm of his size—less than one cultivatable acre—is on a much smaller scale than what the organic program is focused around.

Yale Farm echoes the same concept: the National Organic Program is not accommodating to small farmers. Like the other farms, they are pesticide free and meet all qualifications for becoming organic, however they have not gone through with the certification, either. The situation at Yale Farm is a bit different than that of the other farms. While it is still a small farm with just 2/3 acres for growing vegetables and herbs, it is run by a rather large group of Yale students and other members of the community. During

the school year, there are 8 part-time interns from the Yale student body. During the summer when harvesting picks up, there are 6 full time interns in addition to 40 volunteers harvesting and preparing produce for the Wooster Square Farmers Markets. Unlike many of the other farmers, these student interns are not running the operation by themselves, and theoretically would have time to fill out the paperwork to officially become organic certified. In fact, several students have been successful in filling out the paperwork just to gain the experience, but it has never been formally submitted. The farm manager says there are a few reasons behind this decision to keep them uncertified. First, it encourages more students to fill out the paperwork. Once the paperwork gets submitted, they reach the end of the potential learning opportunity. He says that several students had actually filled out the paperwork, and filed it away for future use in case they decided to submit it. The second, more prominent reason is that they're not sure if they want to support a program that is so anti-small farmer. The National Organic Program is one that has truly shifted further away from small family farms and closer to large, hundred-acre agribusinesses. Any of the farmers interviewed are proof of the current ineffective policy that turns a blind eye to farmers not producing commercially.

The question that remains is what can be done about this? This is an issue that may be preventing more farmers from becoming pesticide free, and is clearly preventing them from becoming certified organic. The obvious best option would be for the National Organic Program to adopt some of the successful practices of organizations that have been accommodating to small farmers, such as Certified Naturally Grown. This organization has done a great job in minimizing the factors preventing small farms from becoming certified—paperwork, most importantly, but also costs. The only aspect in which CNG is lacking is national knowledge of the program. Seeing the CNG symbol at a farm stand may not mean anything to the consumer, whereas the organic symbol is recognized across the country. The National Organic Program should reformulate the way in which it requires small farmers to apply for certification. This would not mean that small farms are any “less organic” than those that are larger, it would just make the certification process more practical. Even though Certified Naturally Grown was created for small farmers, they make it clear that their standards are at the same level as the National Organic Program. Merging the ideas of Certified Naturally Grown with the organic certification process would create a program that small farmers will be readily able to apply for and that consumers would be able to confidently buy into.

Generally speaking, it is atypical for a policy aimed at the environment to be as one size fits all as the National Organic Program. Many EPA regulations and statutes have special rules for operations under a certain size. For example, RCRA, the Resource Conservation Recovery Act, which deals with the disposal of solid and hazardous waste, has differing guidelines dependent upon the size of the facility creating waste. The EPA recognized that small quantity generators of hazardous waste have different

financial burdens and available resources than large quantity generators (Salzman & Thompson, 2010). Similarly under CERCLA, the Comprehensive Environmental Response, Compensation, and Liability Act, which deals with the cleanup of hazardous waste sites, there are different rules and regulations for Potentially Responsible Parties of a smaller size that polluted under a certain limit. While these environmental acts are not directly related to the way in which the National Organic Program is run, it is proof that rules and regulations can be catered to best accommodate parties of different sizes (Salzman & Thompson, 2010).

Of course, waiting for policy to change in order to better suit farmers would result in a significant amount of wasted time. There are a few changes that can be made now to help these small farmers without any changes in the National Organic Program. Because the issues stem from the certification paperwork being too long and difficult to complete, and farmers not having the time or resources to hire an assistant to fill out the paperwork for them, an internship or volunteer-based program could be created to address these needs. Students from local colleges and universities could be assigned to a farm as a paperwork assistant. This program could potentially be run and funded by the state's Department of Agriculture or the Department of Environmental Protection program. The students partaking in the program may be pursuing degrees in Environmental Policy, Agricultural Studies, or a variety of other environment or law related fields. Experience gained by helping these farmers would be beneficial not only in obtaining their degrees, but in future endeavors, as well. Farmers would benefit by receiving additional unpaid help at their farm, and be able to receive organic certification with minimal work done by them. The issue in this would be that it is completely dependent on which local colleges and universities are willing to participate, along with which state governments are willing to enact the program. It is not a universal fix-all in terms of increasing the number of certified organic farms, but it does have the potential to help.

Another option would be to develop computer software that farmers can use to make the paperwork easier to understand and complete. This would work in a similar way to tax filing software—all the same information would be gathered as manually filling out the paperwork, but it would be presented in a more user-friendly way. However, this would only work under a few conditions. First, the farmers would need to have computer access and basic knowledge of how to use it—there may be some instances where this is not the case. The second would be that the farmer is already generally organized in the way that the farm is run and the practices used. Tax software is only simple to use if you already have all the necessary documents and information—if something is missing, it might not be possible to complete. Farmers who don't already have the necessary information about their farm handy may not be able to complete the form. In these instances where the farmer is unorganized, having a student come out and assist with the paperwork would be a better option. However, if the farmer has all required

documentation on their farming practices, the software is a viable solution.

## Conclusion

The National Organic Program fails to effectively encourage small, pesticide free farmers to become certified. While it was originally estimated that costs of certification were the largest preventative barrier, it was actually found that paperwork was the real reason that small farms choose to remain uncertified. Small farmers do not have the time or resources to fill out the extensive 14-page certification form, which requires information that is irrelevant to farms producing at a small scale.

The possibilities of internships and computer software to assist farmers with filling out the certification paperwork are only temporary solutions to the issue at hand. The real, desired outcome would be for the National Organic Program to update its policy in order to accommodate those farmers that are left with little choice but to remain uncertified. The NOP should reinvent their certification process for small farmers by modeling it after the Certified Naturally Grown program, which has been successful in eliminating many of the issues that are present with the NOP. This would mean that small farmers would have different paperwork to fill out than large farmers do. Small farmers would still be held to the same strict guidelines that are present with the NOP, but obtaining the certification would be an easier process for those farmers that otherwise would not have the time to submit the labor-intensive paperwork.

## References

- Baier, A., & Ahramjian, L. (2012, November). *Organic Certification of Farms and Businesses Producing Agricultural Products*. Retrieved from <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5101547>
- CT NOFA. *CT NOFA Farmer's Pledge*. Retrieved from <http://ctnofa.org/farmerspledge.html>
- Salzman, J., & Thompson, Jr., B.H. (2010) *Environmental Law and Policy* (3<sup>rd</sup> ed.). New York, NY: Thompson Reuters/Foundation Press.

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## **Biography**

Rebecca Andreucci is a junior in the Sustainability Studies program in the Tagliatela College of Engineering, minoring in Environmental Science and Economics. She was awarded the EPA Greater Research Opportunities Fellowship, which will fund her research for the next two years, in addition to providing an internship for Summer 2015. Besides holding interests in sustainable agriculture and environmental policy, Rebecca is also interested in urban planning and brownfield redevelopment.

