



**CORNUCOPIA**  
I N S T I T U T E

April 24, 2015

The Hon. Thomas J. Vilsack  
Room 200-A Whitten Building  
U.S. Department of Agriculture  
Washington, D.C. 20250

Dear Secretary Vilsack,

It is with extreme reluctance that The Cornucopia Institute calls upon you to replace the current management and oversight at the National Organic Program (NOP) with a qualified professional dedicated to carrying out the intent and spirit of the Organic Foods Production Act (OFPA) — an individual who is highly respected by the organic industry. We were among the many in the organic community who sincerely welcomed the changes, and new personnel, you brought to the organic program in 2009.

But that bright promise has dimmed, and many important organic industry participants have grown severely disappointed by the direction taken by NOP management over the past several years. It is the opinion of many, including The Cornucopia Institute, that the deep fissures that have developed are now undermining the public/private partnership with the organic sector that Congress envisioned upon passage of OFPA 25 years ago.

This growing divide is threatening the credibility and reputation of the organic label, which has already been downgraded by the largest consumer public interest group, Consumers Reports.

Among the troubling developments are:

- The usurpation of National Organic Standards Board (NOSB) governance and authority by NOP staff;
- The unilateral imposition of dramatic changes to the Sunset review process for synthetic and non-organic materials intended for temporary use in organics;
- The rejection and dismissal of well-reasoned concerns raised by the NOSB, after serious deliberations and stakeholder input, on nanotechnology, hydroponics, aquaculture and other issues;
- A long track record of unacceptable delays in implementing enforcement actions, failure to share names of operations, fines and penalties with the public, and delegating investigative functions to certifiers (some of whom may have contributed to the violations by either incompetence or as co-conspirators); and
- The newly invoked cloaking in anonymity of authors of scientific technical reviews for the NOSB (a public body), so as to mask public scrutiny of credentials and possible conflicts of interest.

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Organic agriculture has proven to be one of the true bright spots in agriculture over the past 25 years. It has created new opportunities for family-scale farmers to make a decent living, and has literally connected millions of consumers in a more conscious, environmentally sound and health-affirming approach to procuring food. Consumer hunger for this type of food and agriculture is demonstrated by the dramatic growth in the marketplace for organics, now close to a \$40 billion a year industry.

However, the great future potential for organic agriculture is endangered by both arbitrary actions and cases of inaction by NOP management. Furthermore, the disrespectful behavior towards the power vested by Congress in the NOSB, and organic stakeholders involved in the collaborative process, threatens to alienate consumers and farmers from the well-deserved cache that organics has earned in the market.

We are bringing these concerns to your attention because you have the ability to make the needed changes regarding NOP oversight and management. We know that not all organic stakeholders share the concerns we are bringing forward for your review (many of these issues have actually been applauded by the agribusiness sector). But we also know that many in the organic community do share our concerns, and that the fissures occurring in organics are growing wider by the day. You have an opportunity to address this situation and make the proper corrections. We encourage you to do so.

Sincerely,

A handwritten signature in black ink that reads "Will Fantle". The signature is written in a cursive, slightly slanted style.

Will Fantle  
Codirector

cc: President Barack Obama