

Secretary Robert F Kennedy, Jr.
US Department of Health and Human Services

Dear Secretary Kennedy,

We wholeheartedly believe that your expressed recognition of the value of organic food in promoting the health and well-being of our citizenry is both long-standing and authentic.

Because of that, we call upon you to actively intervene to save the true meaning behind the organic label.

Under past Democratic and Republican administrations, the value of the organic label has degraded as corporate lobbyists have succeeded in dominating the regulatory environment and weakening the working definition of organic food and farming.

During his tenure at the USDA during both the Obama and Biden administrations, Secretary Thomas Vilsack hired lobbyists from the Organic Trade Association, representing corporate agribusiness, to staff his office and to fill other appointments at the agency. He also succeeded in stacking the National Organic Standards Board, which Congress designed as an <u>independent</u> multi-stakeholder advisory panel, with OTA-affiliated members.

This has resulted in illegal operations and activities that are undermining US family farmers, endangering their livelihoods, and driving thousands off the land — in contradiction of the original intent of Congress to establish organics as the alternative to "get big or get out".

Because President Trump made protecting American workers from a flood of imports one of the hallmarks of his campaign, we are hoping that his administration will work to rein in the copious amounts of imported organic food, much documented as being fraudulent, that are crushing US agricultural producers. And that you will be a key leader in supporting those efforts.

The following issues have undermined the integrity of organics and harmed family-scale US farmers under past administrations (particularly under Secretary Vilsack):

- 1. Numerous incidents of large-scale fraud have been uncovered, both domestic and imported.
- 2. The USDA's response has been to over-regulate across the board, instead of targeting the riskiest imports and domestic production. This has raised the cost of

certification for legitimate US farmers. (As an alternative, mandatory testing would be both more effective and come at a fraction of the cost.

- 3. The National Organic Program (NOP) has failed to judiciously oversee accredited certifiers (per their congressional mandate) and allowed them to engage in illegal conflicts of interest, including accepting "payola" from their largest agribusiness clients.
- 4. At the bequest of corporate lobbyists, the NOP orchestrated the certification of soilless, industrial-scale hydroponic produce operations, in conflict with the Organic Foods Production Act which requires good soil stewardship as a prerequisite for certification. This makes it almost impossible for family farmers who are complying with both the spirit and letter of the law to compete.
- 5. The NOP has failed to aggressively enforce the law that requires legitimate outdoor access, grazing, and humane animal husbandry, thus allowing giant livestock factories to dominate the market for organic meat, milk, and eggs again shutting family-scale farmers out and costing many their livelihoods.

Secretary Kennedy, we are greatly encouraged by your focus on the benefits of eating a healthy diet.

But if you just continue to champion organics in general, without addressing the vast differences between truly authentic organic food and that produced by giant agribusiness and/or imported, often from countries with histories of fraud, we are concerned that you could become an unwitting public relations agent for the corporations that have betrayed the trust of the American consumer and irreparably harmed our country's capacity to create high-quality food for its citizens.

We respectfully ask you to actively engage with USDA Secretary Brooke Rollins to ensure these issues are addressed. And we would like to take this opportunity to convey the willingness of OrganicEye, the preeminent organic industry watchdog, and its leadership to collaborate with you in this process.

Respectfully submitted,

Mark A. Kastel Executive Director OrganicEye