

April 18, 2017

Re: **AMS-SC-16-0112**.Organic Research, Promotion, and Information Order

Dear Acting Administrator Summers,

Farm Bureau is a non-governmental, non-profit, voluntary membership California corporation representing 34,000 farmer and ranchers. Our purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems on the farm, the farm home and in the rural community.

The California Farm Bureau Federation is submitting comments in response to AMS Rulemaking Proposal 16-0112 regarding the creation of an organic checkoff program. Our concerns with the proposal include (1) organic being treated as a commodity and not a system of agriculture production and (2) organic producers having to pay into multiple checkoffs based on their commodity production.

The proposed organic checkoff would be difficult to administer across commodities. Our organic farmers and ranchers produce almost all agricultural commodities and each of them have different research, marketing and promotion needs, and requests. Lumping multiple organic commodities into one checkoff may not accurately represent our member's commodity specific concerns.

Additionally, the proposed organic checkoff creates confusion for our organic producers with dual-covered commodities. Our members currently apply to their commodity checkoff boards for exemption from their federally mandated conventional checkoffs. There is no exemption from state-based conventional checkoffs. This exemption has only recently been introduced and does not address organic production as its own commodity. To only pay into the organic checkoff, farmers will need to exempt themselves annually from paying into the checkoffs of which they currently participating in.

Although California has the highest production of organic agriculture in the U.S., the current proposed rule is concerning to our organic producers and ranchers we represent. We appreciate your time in reviewing our comment and look forward to receiving more clarification on the points we made.

Sincerely,

Sara Neagu-Reed