



United States Department of Agriculture
Mr. Jared Clark
Assistant Director, Standards Division
National Organic Program
RE: NOC Comments on AMS-NOP-22-0029 Rulemaking

May 20, 2026

The Ohio Ecological Food and Farm Association (OEFFA) is a grassroots network of over 1,700 farmers, gardeners, retailers, educators, and others who, since 1979, have worked to cultivate a future in which sustainable and organic farmers thrive, local food nourishes our communities, and agricultural practices protect and enhance our environment. OEFFA is comprised of two distinct entities: the certification and education sides of the organization. OEFFA Certification has been in operation since 1981, and certifies 1,100 organic producers and food processors in a twelve-state region, ensuring that these operations meet the standards established for organic products. We collaborate with partners such as the Accredited Certifiers Association and International Organic Inspectors Association to foster consistency and clarity both in the way we conduct ourselves, and in what we expect from producers and handlers we certify, as well as from our colleagues at the National Organic Program (NOP) and the National Organic Standards Board (NOSB).

OEFFA Education employs sustainable agriculture education, advocacy, and grassroots organizing to promote local and organic foods, helping farmers and eaters connect to build a sustainable food system. We work collaboratively with groups such as the Organic Farmers Association (OFA), the National Organic Coalition (NOC), and the National Sustainable Agriculture Coalition (NSAC) to effect positive food systems change. We support OEFFA farmers and food businesses in their efforts to protect organic integrity and educate their communities about its benefits, rigor, and strong values of transparency and continuous improvement.

OEFFA is a member of NOC, which is a national alliance of organizations working to provide a voice in DC for farmers, ranchers, environmentalists, consumers, and industry members involved in organic agriculture. NOC seeks to advance organic food and agriculture and ensure a united voice for organic integrity, which means strong, enforceable, and continuously improved standards to maximize the multiple health, environmental, and economic benefits that organic agriculture provides. The coalition works to ensure that policies are fair and equitable and encourage diversity of participation and access. **We fully endorse the comments submitted by NOC to this docket on rulemaking regarding changes to the National List for carbon dioxide, meloxicam, methionine, and sodium nitrate, and direct you to their full comment letter.**



We appreciate your serious consideration of these comments. Thank you for the opportunity to give voice to the growers in our network, as we continue to be a leader for organic agriculture in Ohio and the Midwest.

Sincerely,

Lauren Hirtle
Policy Director
Ohio Ecological Food and Farm Association

Kate Pierfelice
Certification Director
Ohio Ecological Food and Farm Association