

Continuous improvement is a core tenant of the USDA organic label. The very purpose of the Organic Foods Production Act is to “establish national standards” and “assure consumers that organically produced products meet a consistent standard.”

Unfortunately, the federal regulatory apparatus has stifled avenues of continuous improvement within the industry. Consumer trust in organic relies on strong and regularly updated standards that reflect the latest understandings on environmental and ecological data, consumer demands, and innovative best practices emerging in organic.

By adopting elements of a process which already exists in OFPA to update the permissible substance list, the CIAO Act will improve regulatory actions by a two-step process:

- **Establishing a priority list and the APA process.** The National Organic Program solicits input from the public on updates and changes to the organic standards. Then, in consultation with the National Organic Standards Board (NOSB), the agency moves forward with setting the priorities, obtaining recommendations from the NOSB, and finally, implementing a notice and comment rulemaking effectuating those changes.
- **Predictable process with latest information.** CIAO establishes a five-year working period for the USDA to consider stakeholder input and engage in the process established. The NOP will consider the best available information in determining revisions and changes to organic standards.

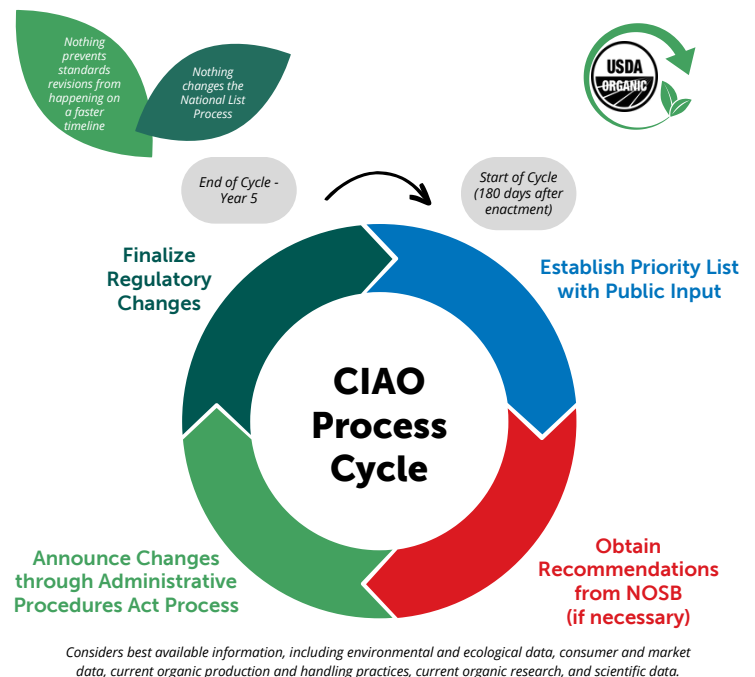
In the last 20 years, USDA completed rulemaking on only

5

out of 19 topics.

80%

of those required, a lawsuit or Office of Inspector + congressional intervention to force rulemaking



Organic is a voluntary private-public partnership for farmers and businesses who choose to meet a strict federal standard thereby incurring additional costs. These producers market their products at a premium using the USDA organic seal to consumers who value those qualities in their purchases. The organic industry is ready to move forward with clear standards to meet producer and consumer expectations. CIAO is the path.

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