



April 15, 2017

Promotion and Economics Division
Specialty Crops Program, AMS, USDA
1400 Independence Avenue SW.
Room 1406-S, Stop 0244
Washington, DC 20250-0244

Re: AMS-SC-16-0112-2265

This comment is submitted on behalf of the Michigan Organic Food and Farm Alliance (MOFFA), a membership organization representing farms, allied trades, marketers and consumers, now celebrating our 25th year of action.

We are opposed to any Organic Check-Off program. The majority of our 150+ members are family farmers who are already selling all that they can produce. They would not benefit in any way from the promotional aspects of the program. Our perception is that if anything, greater promotion will only increase demand for lower priced imports.

The structure of the proposed program exempts producers grossing under \$250,000, but it also gives them no voice in the use of the funds collected, unless they commit to voluntary participation for a period of seven years. Thus the check-off will be guided by and serve the needs of the large corporate interests, not the thousands of family farms which comprise a majority of certified operations.

Add to these considerations the additional paperwork burden that will be imposed on all certified operations, the substantial costs of administration, and the absence of accountability, and it is clear that the check-off will be detrimental to small and medium sized family operations, and benefit only the largest corporate producers and handlers.

With the proposed system of selecting a limited panel of producers and processors to represent and make marketing and research choices for the organic farming movement, the potential risk of special interests redefining organic far outweighs any potential benefits. Given the past failures of the USDA NOP to address important issues like organic hydroponic in a timely manner, and the at times flawed process of selecting and supporting NOSB members, the risk of undesired consequences is too great.

Sincerely,

A handwritten signature in black ink that reads "John A. Biernbaum".

John A. Biernbaum, PhD, Chair
on behalf of the Michigan Organic Food and Farm Alliance