NOFA-NY
NORTHEAST ORGANIC FARMING ASSOCIATION OF NEW YORK

June 11, 2025

Erin Healy, Director, Standards Division
National Organic Program, USDA–AMS–NOP
1400 Independence Ave. SW
Room 2642–So., Ag Stop 0268
Washington, DC 20250–0268
RE: AMS-NOP-22-0063

NOFA-NY Comments to the Agricultural Marketing Service on Mushrooms and Pet Foods Standards Proposed Rule

Founded in 1983, NOFA-NY is the leading organization driving the growth of organic regenerative agriculture across New York State. We offer farmer-to-farmer education and technical support to farmers statewide, help connect consumers with local, organic products, and advocate for just and resilient food and farm systems. As a USDA-accredited organic certification body, NOFA-NY proudly certifies nearly half of New York's organic farms and businesses. Given NY's strong livestock industry, we are a leading certifier for organic livestock operations nationally.

According to the most recent USDA Organic Census of Agriculture, New York is home to more farms that grow mushrooms than any other state in the nation and is a leader in raising organic livestock, ranking first in the number of farms raising cattle and first in organic field crop acreage. Therefore, the final rule for Mushrooms and Pet Food would have had important implications for hundreds of organic farms in the state.

Organic farms require a fair and even playing field in which standards are consistent, clear and enforced and the Organic community has welcomed the adoption of improved standards by the National Organic Program. The final rule would have made important strides in resolving inconsistencies between certifiers, clarifying that animal products can be fed to pets whereas they

cannot be fed to livestock, and increasing the marketplace for organically produced mushroom spawn and substrates as well as animal by-products. **Rescinding the final rule on "Market Development for Mushrooms and Pet Food," will hurt NY organic farmers and the organic industry by enabling inconsistencies and lack of clarity in current standards to persist.**

Furthermore, we strongly disagree with the claim that rescinding rules to reduce the burden of regulation is beneficial to organic farmers. Inconsistency and lack of clarity in organic rules causes confusion and erodes trust in the organic label harming both organic farmers and the market for their products. The organic community and the National Organic Standards Board (NOSB) voluntarily asked for rules to help clarify standards, deter fraud, and increase the market for organic slaughter by-products, organic pet foods and organic mushrooms. Furthermore, all organic rules are voluntary since these are "opt-in" rules. Farmers voluntarily agree to abide by the organic rules and advocate for continuous improvement of them to ensure that the organic marketplace has integrity.

As a member of both the National Organic Coalition and the Accredited Certifiers Association, NOFA-NY supports the detailed comments submitted by each organization.