NOFA-NY
NORTHEAST ORGANIC FARMING ASSOCIATION OF NEW YORK

Comments on the Proposed USDA Reorganization Plan Announced in July 2025

August 28, 2025

These comments are submitted on behalf of the Northeast Organic Farming Association of New York (NOFA-NY) in opposition to the USDA's proposed reorganization plan. NOFA-NY provides USDA-accredited certification for approximately 1,000 New York operations and offers farmer-to-farmer education on a variety of topics, including adopting organic practices, marketing farm products, advancing soil health, and much more.

The USDA Proposed Restructuring Plan was developed without the input of Congress or relevant stakeholders and, combined with recent staffing cuts and funding freezes at USDA, will have a long-lasting, negative impact on the agency's ability to fulfill its mission nationwide, resulting in massive consequences for farmers and families.

NOFA-NY and the farmers we work with rely on the United States Department of Agriculture for resources, technical assistance, and critical research and safety efforts that are in the interest of food systems and communities in New York. Dedicated USDA staff at both the agency's Washington, DC headquarters and at local offices are essential to fulfilling the agency's functions for the public.

This proposed reorganization would be immensely harmful to our organization and the farmers we serve.

Potential impacts specific to the National Organic Program (NOP) include:

- **Loss of critical expertise and institutional knowledge.** NOP staff bring years of specialized expertise in organic regulations, compliance, and enforcement. If this reorganization results in staff departures, we risk losing irreplaceable institutional knowledge that underpins the credibility of the organic label. USDA Organic is a more than $70 billion industry, having grown from $8.9 billion in 2002 when USDA first began administering the organic label. The NOP team delivers exceptional value—ensuring marketplace integrity, enforcing rigorous standards,

and safeguarding consumer trust with a remarkably small budget relative to the size of the sector. This is one of USDA's best returns on investment, but training new hires in these complex systems takes years, during which enforcement and policy work can suffer.

- **Reduced face-to-face access for farmers and businesses.** Organic farmers and stakeholders depend on in-person meetings with NOP staff during fly-ins and advocacy days in D.C. Relocating leadership away from Washington will make USDA less responsive and less connected to the real-world needs of organic operations.
- **Fragmented oversight and slower decision-making.** The NOP employees who are currently based in D.C. provide essential coordination, policy, and interagency functions. Further dispersing this already limited D.C. team risks fragmenting communication, slowing decision-making, and weakening oversight at the national level.
- **Weakened interagency collaboration and enforcement.** NOP's partnership with Customs and Border Protection is essential to stopping fraud at ports of entry, while collaboration with Farm Service Agency (FSA), the Natural Resources Conservation Service (NRCS), and the Risk Management Agency (RMA) connects farmers to critical USDA resources. Fewer staff in D.C. will undermine these collaborations, leaving farmers and markets more vulnerable.

Additional cross-agency and program impacts may include:

- **Increased wait times for information and application assistance** for farmers and ranchers seeking to access conservation programs, loans, and other USDA programs. We have been experiencing bottlenecks with our local USDA agencies for years: further reducing or disrupting staff will only exacerbate this issue and make essential agriculture programs less impactful.
- **Disruption of services for critical nutrition programs**. Closing regional offices will shut off the first line of support for state and tribal agencies administering programs like SNAP and WIC in our communities.
- **Abandoned long-term agricultural research.** USDA conducts and supports research at institutions nationwide, including the stewarding of publicly held seeds – losing this capacity will threaten our national food security and resilience for the future.
- **Increased risk of food-borne illness and significant crop loss** from disease and pest outbreaks. If USDA is less able to track and respond to these threats, the health and livelihoods of our farmers, ranchers, and communities are on the line.
- **Lack of communication, information, and access.** Staff cuts have already massively reduced the agency's ability to respond to basic questions about grants and programs, to ensure timely

disbursement of funds, and to provide technical assistance and agricultural data. We count on USDA for these core services, and the sector cannot function smoothly without them.

Impacts like those described above are more than hypothetical; they are likely, and we have already begun to experience them in New York, where we've seen a 24% loss of USDA employees based in NY since January, largely due to DOGE's "Deferred Resignation Program."

I strongly urge USDA to reconsider this decision to relocate staff and consolidate agency functions. Our farmers and communities need a fully staffed, responsive, and effective USDA to deliver on its mission, and this plan will only harm that endeavor.

At a minimum, any changes to USDA's structure intended to strengthen its mission should only proceed after the agency produces a thorough and transparent benefit-cost analysis of options for improving both USDA staff retention and services; a report explaining how such changes would not negatively impact USDA's mission and services; and a formal public input process, including stakeholder listening sessions and transparent comment opportunity via the Federal Register.

Sincerely,

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