

May 9, 2024

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

Dear Ms. Healy:

On behalf of the International Fresh Produce Association (IFPA), we respectfully submit the following comments on the National Organic Program's proposal for proposed definitions and production standards for organic mushrooms.

Established in 2022 and founded on a deep-seated history of leadership from the Produce Marketing Association and United Fresh Produce Association, our trade association represents over 2500 companies from every segment of the global fresh produce supply chain, including over five hundred companies directly involved in the organic fresh fruit, vegetable, and floral supply chain. IFPA is committed to serving all sectors of the produce industry through government advocacy, global engagement, and expertise in food safety, technology, supply chain management, sustainability, marketing, and leadership. As the IFPA represents mushroom growers, including members like the American Mushroom Institute (AMI), we aim to support the comments AMI has submitted.

Firstly, it's essential to acknowledge the mushroom industry's extensive experience in organic production, spanning over two decades. This background underscores the need for clear definitions and practical standards that producers and certifiers can easily understand and implement. Given the stability and familiar nature of the workforce in the mushroom industry, ensuring clarity in regulations is paramount to facilitate smooth compliance.

Concerns have been raised regarding the necessity of new standards, particularly in light of the existing organic regulations, which lack specific standards for mushrooms. While we recognize the importance of consistency and market growth, we join AMI in cautioning against unnecessary rulemaking that may disrupt established practices without significant benefits.

Regarding the proposed one-year implementation period, it's crucial to consider the mushroom industry's complexity and the challenges posed by the availability of organic agricultural byproducts required for cultivation. Any transition period should allow sufficient time and education to smoothly adapt to new standards without burdening growers or suppliers.

The mushroom industry also highlights concerns about the proposed requirements for producing certified organic spawns, emphasizing the limited availability of organic agricultural byproducts and the proprietary nature of many commercial mushroom strains. They stress the importance of considering commercial

availability in setting standards and avoiding singling out mushrooms for unique requirements not applied to other crops.

Regarding the sale of certified organic mushrooms, it's essential to recognize the challenges growers face, including higher costs and lower yields than conventional production. While organic production continues to grow, market demand and pricing considerations may influence the proportion of organic mushrooms sold compared to conventional ones.

In response to specific questions raised in the proposal, AMI provides detailed comments and clarifications on key terms such as mushrooms, mushroom substrate, mycelium, spawn, compost, and crop standards. They advocate for definitions and standards that reflect the diverse nature of mushroom cultivation practices and emphasize the importance of practicality, accuracy, and commercial availability in regulatory requirements. We encourage the program to review these extensive comments.

In conclusion, IFPA urges the USDA to work closely with mushroom industry stakeholders to develop standards that support organic mushroom production without imposing undue burdens or disrupting established practices. Collaboration and transparency are essential to ensure the continued success and growth of the organic mushroom market while maintaining alignment with industry best practices.

We appreciate your consideration of these comments.

Sincerely,

Sara L. Neagu-Reed
Director, Production & Environmental Policy