



CCOF

Advancing organic agriculture through certification, education, advocacy, and promotion.

November 21, 2025

California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

Submitted via climate@cdfa.gov

Re: CCOF Comment on the Draft Climate Resilience Strategy for California Agriculture released Oct. 7, 2025

Dear Deputy Secretary Jameson:

California Certified Organic Farmers (CCOF) appreciates the opportunity to comment on the draft Climate Resilience Strategy for California Agriculture ("the Strategy" or "RSA"). We are a producer-led nonprofit organization that represents over 3,000 organic farmers, ranchers, food manufacturers, and retailers across the state.

CCOF commends the California Department of Food and Agriculture (CDFA) for undertaking a forward-looking framework to support the resilience of California agriculture in the face of climate change. Organic agriculture aligns with the pillars of a resilient food sector, protecting natural systems, and resilient practices, and we believe the RSA presents a pivotal opportunity to amplify and support organic and agroecological systems.

Overall, we appreciate that the RSA explicitly acknowledges the biodiversity benefits of organic farming and names managing 20% of cropland organically as a healthy soils target. While the RSA provides an expansive set of strategies, we are concerned that without clear prioritization and cost assessments, implementation will stagnate. Limited funding and staff capacity necessitate that CDFA narrow its focus to advance any of the 83 recommendations included. We encourage CDFA to prioritize recommendations based on existing climate and resilience targets.

More specifically, we recommend the RSA include actions to reach the State's organic acreage targets. In the 2022 Scoping Plan and the AB 1757 Nature-Based Climate Solutions, California established the climate target to convert 10% of cropland to organic by 2030, 15% by 2038, and 20% by 2045. The most recent USDA data put total organic cropland at 411,000 acres¹ and total cropland at 10 million acres.² To reach 20%, California must increase organic cropland by 1.6 million acres. Even if CDFA does not rely on USDA data, the Scoping Plan includes the recommendation to increase organic cropland by 65,000 acres annually and the Nature-Based Solutions Climate Targets estimate 20% of cropland at 1.6 million acres total.³ Despite this significant increase in organic acreage, the RSA does not include a single recommendation aimed at meeting this target. We strongly recommend the Strategy include organic-specific recommendations to ensure progress toward state climate goals. Based on input from our members, we encourage the Strategy include the following recommendations under Chapter 10, section

¹ USDA NASS (2022) *Certified organic survey 2021 summary*.

² USDA NASS (2024) *2022 census of agriculture California state and county data*.

³ [NBS Climate Targets - Appendix 1 Methodology](#)

1 to Encourage the adoption of climate-smart and healthy soils practices to bolster California's lands against the impacts of climate change:

- 10.1.3 Analyze the Organic Market: Conduct a statewide market analysis of the organic sector. Organic farmers cannot make informed business decisions without access to market data, including organic price premiums, comparisons to non-organic prices, and rates of return. Additionally, farmers and policymakers alike would benefit from a better understanding of the status of the organic sector, including employment and wage data, economic impacts, growth opportunities, trade data, and commodity-specific data. Currently, the State, USDA, and certifiers report disparate data on organic acreage and number of organic operations. A statewide market analysis would represent the premier dataset on the organic sector to guide stakeholders.
- 10.1.4 Stabilize Organic Demand: Establish state organic procurement targets. The State can create stable and long-term market opportunities for organic farmers by using its own purchasing power. Whether in school cafeterias, government hospitals, prisons, or state parks, the State has significant purchasing power. Creating organic targets for government food purchases will not only build resiliency against market disruptions like inflation and inconsistent geographic demand, but it will also expand access to the health benefits of organic food.
- 10.1.5 Limit Risk for Small-scale and Underserved Farmers: Create stable funding for California's Organic Transition Program. The three-year transition to organic certification often creates an insurmountable barrier to entry for underserved farmers. Small-scale farmers often manage their businesses on thinner margins while socially disadvantaged farmers face historical and current discrimination that limits access to resources and information. California's Organic Transition Program provides financial and technical assistance to these underserved farmers to limit risk during the transition and ensure organic certification is accessible to all farmers.

Finally, we strongly oppose Recommendation 1.7 to expand climate-smart agricultural marketing efforts. It is costly and challenging to create a climate-smart marketing claim with integrity. Any marketing effort that is not equally robust with third-party certification and annual inspections will undermine organic certification. CDFA is ill-equipped to invest the staff and funds necessary to establish a rigorous market claim.

Thank you for your consideration of our comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rebekah Weber', with a stylized, cursive script.

Rebekah Weber
Policy Director