



CCOF

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

Ms. Michelle Arsenault
Advisory Committee Specialist
National Organic Standards Board, USDA-AMS-NOP
1400 Independence Ave. SW., Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-19-0038-0001

Re: Materials Subcommittee: Genetic Integrity Transparency of Seed Grown on Organic Land –
Instructions to Certifiers Proposal

October 3, 2019

Dear Ms. Arsenault and NOSB:

Thank you for the opportunity to comment on the Materials Subcommittee's proposal "Genetic integrity transparency of seed grown on organic land – instruction to certifiers."

CCOF is a nonprofit organization governed by the people who grow and make our food. Founded in California more than 40 years ago, today our roots span the breadth of North America. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

CCOF supports the proposal for the NOP to provide certifiers with further instruction on organic seeds. CCOF supports requiring certifiers to provide information to their clients on crops and varieties that may be subject to contamination and certifiers information clients to test seed or planting stock. The proposal presents concrete steps that are achievable for the NOP, accredited certifiers, and certified operations alike.

NOSB should reference the Organic Seed Alliance's resources and "State of Organic Seed" report as an important source of information that should be considered carefully in crafting policy. The survey indicates that testing of seed is quite widespread and that test results could be available to producers who request them. Requiring certifier training and instruction on requesting clients to present seed test results is a viable step forward.

NOP should include training for certifiers on best practices and parameters for testing for GMOs in both seeds and harvested crops. This training could be added to the annual certifier training and would help certifiers of all scales.

CCOF also supports NOSB's request for a task force on seed genetic integrity. The issues around seed usage are complicated and need expertise from stakeholders beyond the members of the NOSB. The task force could lead the organic community in data collection, evaluating testing protocols, examining regional differences, protecting genetic diversity of available germplasm, and more.

Thank you for your review of our comments. Please do not hesitate to contact me for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Nell". The signature is fluid and cursive, with the first name "Peter" and last name "Nell" clearly distinguishable.

Peter Nell
Government Affairs Manager

cc: Kelly Damewood, CEO, CCOF, Inc.
April Crittenden, Chief Certification Officer, CCOF Certification Services, LLC
Rebekah Weber, Policy Director, CCOF, Inc.