



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: Research Priorities

October 3, 2019

Dear Ms. Arsenault and NOSB:

Thank you for the opportunity to comment on the Materials Subcommittee's 2019 research priorities.

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 NOSB's research priorities and urges the Board to continue to publish them. The research priorities put forth by the Materials Subcommittee are insightful and useful to researchers, universities, and organizations looking to fill research gaps in organic agriculture.

CCOF recommends NOSB relist research on fire blight to the priorities. Fire blight control is a critical problem for our members and organic producers. In the past, NOSB listed fire blight in the research priorities and it should be relisted as an area of important research. CCOF hears from producers struggling with fire blight and some producers drop out of certification due to antibiotic treatment of fire blight.

Congress responded to the needs of the organic and broader agricultural sector by boosting funding for USDA's premier organic research program, the Organic Agriculture Research and Extension Initiative OREI from \$20 million to \$50 million by 2023 to achieve permanent funding for the program. With the increase in funds available to researchers, NOSB's research priorities are essential to provide real examples of needed research in organic agriculture.

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.