



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-18-0071-0001

Re: Crops Subcommittee Proposal: Strengthening the Organic Seed Guidance April 2019

April 4, 2019

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Crops Subcommittee's proposal "Strengthening the organic seed guidance April 2019."

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 provides the attached comments on the proposed changes to the National Organic Program's (NOP) Organic Seed, Annual Seedlings and Planting Stock Guidance (NOP 5029). CCOF supports all proposed updated to certifier responsibilities and supports the NOSB's continued efforts to improve NOP 5029.

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 that reads "Peter Nell".

Peter Nell
Government Affairs Manager

cc: Kelly Damewood, CEO
Jody Biergiel Colclough, Interim Chief Certification Officer, CCOF Certification Services, LLC

CCOF's Comments on the Crops Subcommittee Proposal Strengthening the Organic Seed Guidance

The following comments are based on CCOF member input, our experience offering organic certification for more than 40 years, and our certification of over 2,500 organic farms throughout North America.

1. NOSB should expand 4.1.2(c) to include other sources of information on variety trials.

CCOF supports variety trials as a viable option for organic producers to search for organic varieties of seed and planting stock. Rather than just noting that producers can use catalog or website seed descriptions, 4.1.2(c) should be expanded to include other ways for growers to get variety trial data. Producers have other options such as neighboring farms, cooperative extension agents, seed companies, and organizations that conduct public variety trials such as the Organic Seed Alliance. Seed catalogs may only report positive and promotional information about varieties. Therefore, producers need other methods to determine which varieties are right for their operation.

2. NOSB should adjust the wording to proposed change to 4.1.6.

NOSB should use a clearer term than “organic vegetative crop” in the proposed change to 4.1.6. CCOF recommends the proposed change to be worded as:

4.1.6 Use of non-organic planting stock to produce organic crops is subject to commercial availability as per §205.204(a)(1). If planting stock is from a non-organic source and is used to produce perennial crops, then the vegetative harvest from that planting stock may be sold, labeled or represented as organic planting stock ~~or an organic vegetative crop~~ only after 12 months of organic management §205.204 (a)(4).

3. NOSB should consider whether a broader term than “handlers” is more appropriate under 4.2.1(b)(3).

CCOF supports strengthening the responsibility of buyers who supply seed to contract growers. The proposal uses “handlers” throughout; however, contract growers may have contractual agreements with handlers and other growers as well. A contract grower may even use another grower’s land to plant and harvest a crop while the certified client only provides the field work. Therefore, NOSB should consider whether a broader term, such as “buyer,” is a more appropriate term.