



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: Materials Subcommittee Discussion Document: Assessing Cleaning and Sanitation Materials Used in Organic Crop, Livestock, and Handling

April 4, 2019

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Materials Subcommittee's discussion document "Assessing cleaning and sanitation materials used in organic crop, livestock, and handling."

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 goal of creating consistent National List review criteria for cleaning and sanitation materials that directly contact crops, livestock, and food. However, NOSB should clearly explain what the additional system of review will be and how it will fit within the Sunset Review process. NOSB should continue to focus on sanitizers that have direct contact with organic food, crops, and livestock, and not on equipment sanitizers. Equipment cleaners and sanitizers play an important role in ensuring safe environments for organic food production and are widely used across the organic production spectrum. Additional guidance on reviewing equipment cleaners is unnecessary.

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