



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-18-0029-0001

Re: Materials Subcommittee: Excluded methods determinations October 2018 proposal

October 4, 2018

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Materials Subcommittee's proposal "Excluded methods determinations October 2018."

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 Materials Subcommittee's continued work on excluded methods because it calls attention to the complexity of GMOs and their impacts on organic agriculture and handling. CCOF supports the conclusions made in the proposal, including the complete definitions of the terms proposed during the fall 2017. CCOF supports the inclusion of transposons as an excluded method and the determination that embryo rescue in plants is not an excluded method.

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
Policy Specialist

cc: Cathy Calfo, Executive Director/CEO
Kelly Damewood, Director of Policy and Government Affairs
Jake Lewin, President, CCOF Certification Services, LLC