



# CCOF

Organic Certification

Education & Outreach

Political Advocacy

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-16-0100-0001

Re: Certification, Accreditation & Compliance Subcommittee Discussion Document: Eliminating the Incentive to Convert Native Ecosystems to Organic Production

March 30, 2017

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Certification, Accreditation & Compliance Subcommittee's discussion document titled "Eliminating the Incentive to Convert Native Ecosystems to Organic Production."

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.

Soil health, biodiversity, and conservation are critical to organic systems. CCOF recently updated its Organic System Plan (OSP) to better implement the new NOP Guidance on Biodiversity (NOP 5020), and we are committed to working with our members to maintain or improve their operations' soil health and biodiversity.

CCOF recognizes the subcommittee's concerns about conversion of fragile lands to agricultural production. These lands are often attractive to producers interested in accelerating the transition timeline. The more desirable alternative to encouraging conversion of fragile lands to organic production would be to encourage conversion of conventional land to organic.

CCOF does not have data on occurrences of organic agricultural conversion of high value lands or fragile ecosystems. By the time a producer comes to a certifier, the conversion has likely already occurred. CCOF also does not have a definition or way to identify what lands would qualify as high value or fragile. Therefore, conversion of high value land and fragile ecosystems would be more effectively addressed through local land use designations and other environmental regulations that can prevent conversions before they occur.

If the NOSB defines high value conservation land or fragile ecosystems, then it should evaluate any existing federal definition of these terms. It is critical that new requirements do not conflict with other environmental and land use requirements because conflicting or unclear definitions could create additional barriers to certification.

Thank you for working on this important issue. Please do not hesitate to contact me for further information.

Sincerely,

A handwritten signature in black ink that reads "Kelly Damewood".

Kelly Damewood  
Director of Policy and Government Affairs

cc: Cathy Calfo, Executive Director/CEO  
Jake Lewin, President, CCOF Certification Services, LLC