



# 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-16-0049

Re: Materials/GMO ad hoc Subcommittee Proposal: Excluded Methods Terminology

October 25, 2016

CCOF (California Certified Organic Farmers) thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the Materials/GMO ad hoc Subcommittee's proposal on excluded methods terminology.

CCOF is a nonprofit organization founded in 1973 that advances organic agriculture for a healthy world through organic certification, education, advocacy, and promotion. CCOF is based in Santa Cruz, California, and represents more than 3,000 certified organic members in 42 states and three countries.

CCOF supports guidance on excluded methods technologies, terms, and issues because it will serve as a useful reference tool in verifying the prohibition of the use of excluded methods.

Thank you for considering our input. Please contact us if you would like further information or clarifications.

Sincerely,

Handwritten signature of Cathy Calfo in black ink.

Cathy Calfo, Executive Director/CEO

Handwritten signature of Jake Lewin in black ink.

Jake Lewin, President, CCOF Certification Services LLC