



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: Handling Subcommittee: Proposal--Annotation Change for the Listing of Tocopherols at §205.605(b)
and Proposal—Additional Listing of Tocopherols at §205.605(a)

October 25, 2016

Dear Ms. Arsenault and NOSB Members,

CCOF (California Certified Organic Farmers) thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the Handling Subcommittee's two proposals to modify the annotation for tocopherols and to add tocopherols to §205.605(a).

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 the Handling Subcommittee's efforts to make the National List consistent with production and use of tocopherols by amending the §205.605(b) annotation for tocopherols to remove reference to rosemary oil and listing tocopherols on §205.605(a) of the National List.

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