



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 Discussion Document: Marine Algae Listings on the National List

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 discussion document on marine algae listings on the National List.

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 shares the Handling Subcommittee's concern about the intense pressure being placed upon global aquatic ecosystems from fishing and aquatic plant harvest operations. All marine-derived materials used in certified organic production should be harvested in a sustainable manner in order to meet the requirement that materials on the National List not have adverse impacts on biodiversity. It would be most efficient to consider the broader issue of sustainable aquatic plant sourcing than take up this question for each individual species on the National List. Over time, the NOSB might consider a recommendation that mass-harvested aquatic plants be verified as sustainably harvested by a third party that maintains such standards.

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