



# 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 Subcommittee Proposal: 2016 Research Priorities

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 Materials Subcommittee's proposal on 2016 research priorities.

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.

The research priorities put forth by the Materials Subcommittee are insightful and useful. The organic community needs the same level of rigorous research support that conventional agricultural enjoys.

Among the many important research priorities identified in the proposal, the following priorities stand out as particularly relevant for CCOF members:

- Developing alternative methionine sources for organic poultry production
- Managing parasites in organic livestock production
- Managing fire blight in organic apple and pear production
- Finding alternatives to copper as a fungicide and algaecide
- Developing sources of organic celery powder for organic cured meats
- Preventing GMO contamination in organic crops
- Maintaining public breeding lines free of transgenic sequences
- Researching organic no-till systems

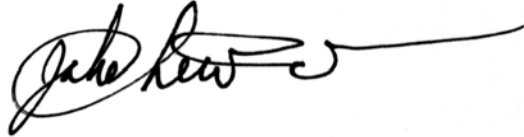
Using whole-farm systems approaches to studying these pressing issues will yield the most useful information for organic producers.

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

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC