



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: Crops Subcommittee: Discussion Document on Strengthening the Organic Seed Guidance

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 Crops Subcommittee's discussion document on strengthening NOP's guidance on organic seed.

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.

Several suggestions in the discussion document could help increase the use of organic seed such as increasing the number of required searches, setting limits on the number of seasons non-organic seed may be used, and setting organic seed usage goals in producers' Organic Systems Plans.

An important incentive CCOF uses to support the use of organic seed is to allow growers to deduct the cost of organic seed from their gross organic production value in calculating their annual certification fees. The deduction for organic seed was implemented over a year ago to help strengthen the organic seed industry, and it has been effective in motivating growers to search for and buy organic seed.

Additionally, CCOF inspectors work closely with certified producers to verify that they are making adequate efforts to source organic seed and that they are increasing the amount of organic seed they plant over time.

The NOSB should consider strategies to increase the use of the AOSCA Organic Seed Finder website or another platform that can bring together all available organic seed. Currently, the AOSCA Organic Seed Finder is not used by enough companies and kept regularly populated to provide sufficient use for producers. But if organic seed was aggregated under such a platform, CCOF could potentially require some kind of search receipt to verify efforts to source organic seed. Therefore, it would be in the interest of organic producers to promote the use of the Organic Seed Finder.

Finally, the most critical advancement for organic certification related to GMOs is the development of a seed purity standard. CCOF recommends that a USDA Seed Purity Advisory Task Force be convened and assigned to develop processes to:

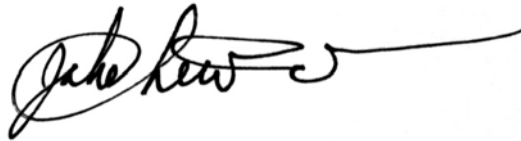
1. Consider phasing in a requirement that certifiers require verification that at-risk seed is non-GMO.
2. Gather data on the incidence of GMO presence in nonorganic seed used in organic production. Additionally, it would be helpful to gather data on all possible sources of contamination (seed, pollen transfer in field, or commingling during harvest, transport, and packaging) to better inform prevention strategies.
3. Design a feasibility study on establishing a threshold for GMO presence in nonorganic seed used for organic production.
4. Strengthen implementation of the organic seed requirement by making organic seed usage an Organic System Plan goal. CCOF is identifying baseline levels of organic seed use for all of its growers and plans to use the information to increase organic seed use.
5. Initiate a pilot soybean testing program.

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