



# 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-15-0085; NOP-15-16  
Re: Livestock Subcommittee: Annotation Change for Parasiticides

April 13, 2016

Ms. Michelle Arsenault and NOSB:

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the proposed annotation change for parasiticides.

CCOF (California Certified Organic Farmers) 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 agrees with the proposed changes in the annotation for parasiticides. These changes clarify the rules guiding pesticide use in certified organic livestock production, making them more workable for producers and easier to verify by certifiers.

Thank you for taking the time to review our information. Please contact us if you would like further information or clarifications.

Sincerely,

Handwritten signature of Cathy Calfo.

Cathy Calfo, Executive Director/CEO

Handwritten signature of Jake Lewin.

Jake Lewin, President, CCOF Certification Services LLC

