



# CCOF

Organic Certification

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Ms. Michelle Arsenault  
Advisory Committee Specialist  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave. SW.  
Room 2642-So., Mail Stop 0268  
Washington, DC 20250-0268

**Docket: AMS-NOP-15-0037; NOP-15-11**

**Re: Crops Subcommittee Proposal: Annotation Change for Micronutrients**

October 7, 2015

Dear Ms. Arsenault and NOSB:

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the proposed annotation change for micronutrients. CCOF advances organic agriculture for a healthy world through organic certification, education, advocacy, and promotion. Founded in 1973, CCOF certifies more than 3,000 certified operations in 41 states and three countries, covering 2.1 million acres of productive farmland.

CCOF has 801 members who list on their Organic System Plans one or more micronutrient inputs that would be affected by this annotation change. Commonly used micronutrient products include Biomin Booster, Citra Grow products, Green Cypress Tree and Vine Mix, Organic BioLink Micronutrient Fertilizer, and Phyto-Plus Zinc.

Certifiers verify that growers are not over-relying on micronutrients in lieu of a holistic soil fertility plan because this is already a requirement of NOP §205.203, Soil fertility and crop nutrient management practice standard. And CCOF supports the continued prohibition of micronutrients for use as pesticides, i.e. as defoliants, herbicides, or desiccants.

CCOF supports NOSB's proposal to alter how operations document deficiency for use of micronutrients. Operations should still be required to document deficiency. However, they should be able to document deficiency through methods other than testing. Although a soil or tissue test is one tool to demonstrate a need for specific inputs, it cannot replace a grower's own intimate knowledge of the soil and crop chemistry.

The annotation change for micronutrients is critical because it will ensure that growers have timely and effective documentation for appropriate micronutrient use. Growers apply their agronomic expertise and observation skills to determine when micronutrients might optimize crop production because many crops, such as citrus, often exhibit a micronutrient deficiency through crop loss long before a soil test

shows a deficiency. In perennial orchard plantings, newly planted trees typically have a higher micronutrient need than established trees. Additionally, some micronutrients which test in the normal range can be locked up in the soil if they are not adequately balanced with other micronutrients. The existing testing restriction also limits how organic farmers and crop researchers can experiment with bolstering crop resistance to insects and disease through applying micronutrients.

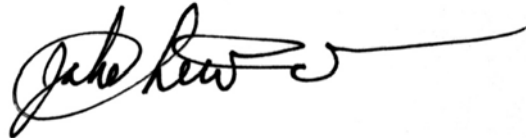
In short, growers should be allowed to document deficiency through tools other than tests. For example, documentation could include photos showing deficiency symptoms, written recommendation from licensed crop advisors, records of decreased crop yields, written documentation outlining experience with the soil and crop at the site for application, and supporting university research. Overall, documentation should not be a prescriptive requirement.

Thank you for taking the time to review this material. Please contact us for further information or clarifications.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC

