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–So., Mail Stop 0268
Washington, DC 20250–0268

Docket: AMS-NOP-15-0037; NOP-15-11
Re: 2015 Materials Subcommittee Proposal: Research Priorities for 2015

October 7, 2015

Dear Ms. Arsenault and NOSB:

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on organic research, which is a top priority for CCOF members. 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 endorses the full list of research priorities that NOSB is presenting this year.

Materials and GMO ad hoc Subcommittees Research Priorities
CCOF appreciates that NOSB recommends research on effective buffer width; equipment/vehicle cleanout protocols; upwind siting; and the role of pollinators in spreading transgenic plant pollen. The results of these studies should be disseminated widely to the organic community.

CCOF also supports policy efforts to incentivize conventional growers to reduce GMO drift from their farms.

Livestock Subcommittee Research Priorities
Systems research is needed to provide data on how management systems impact plant and animal production. Specifically, CCOF members have identified parasiticide research as an ongoing priority for them because parasites are a perennial problem in all livestock production systems.

CCOF encourages systems studies on how best to maintain herd and flock health by choosing sturdy livestock and poultry breeds, providing balanced rations that meet animals' range of nutritional needs, utilizing grazing strategies that maintain animal and pasture health, and accommodating animals' natural behaviors.

Developing alternative sources of methionine is an ongoing priority for organic poultry producers because it is difficult to develop a ration that contains adequate methionine without oversupplying protein.

Handling Subcommittee Research Priorities
CCOF agrees that the organic community needs a wide variety of compliant and effective sanitizers to choose from, including alternatives to chlorine. This research is especially critical as new food safety regulations and industry-driven food safety standards are implemented.

Crops Subcommittee Research Priorities
CCOF oversees copper applications for disease management in organic production systems to ensure that growers apply minimal amounts and accumulation in the environment does not occur. Research is needed to find alternatives to copper formulations for organic disease management.

For reference, attached is a list of research priorities that CCOF gathered during a series of CCOF chapter meetings this fall held in collaboration with the Organic Farming Research Foundation. The topics reflect immediate production challenges that growers are experiencing as well as more general issues that they think are important.

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

Master list of CCOF member-identified research priorities Fall 2015

Plant Production

Bagrada Bug control
Downy Mildew control (on spinach, cucumbers, squash, artichokes)
Refining flaming techniques
Cabbage Aphids on Brassicas
Cucumber beetle (sticky traps, not adequate) (life cycle and strategies in organic)
2-spotted mite- strawberries
Botrytis in heirloom tomatoes
Corn earworms- seasonal
Lygus bug
Drosophila- vinegar fly
Additional research on bug vacuum for pests on crops (other than strawberries)
Organic control of fireblight
Organic control of symphylans
Organic wire worm control
Organic control of the weed goathead
Organic control for olive fuit fly
Benefits/verifying companion planting and pollinator pathways/insectory
Research on biological control of insects
Leaf hopper organic control in vineyards
Nutrient quality of organic vs conventional grapes
Brown Marmorated Stink bug organic control
Effects of organic vs conventional production on ecosystem
Leaching of organic herbicide/pesticides into the water table
Organic flea beetle control for hot climates (biocontrol doesn't work over 85 degrees)

Soil Health/Quality

Animal interaction with soil health/quality
Salt build up with lack of rains to leach it
Carbon sequestration differences between different tillage regimes (scientific evidence that certain tillage practices destroy less carbon) (Spader vs ripping and chiseling)
Mineralization potential of different types of soil
How to build organic matter in sandy soils
Biochar
Alternatives to rice bran in Anaerobic Soil Disenfestation (too expensive, too much N)
Organic fumigants
How much and what type of nitrogen is deposited from sheep grazing (in regards to vineyard management)
What effects do cover crops have (in regards to soil fumigants) when breaking down?
Comparison of conventional and organic erosion rates

Animal Production

Processing/Slaughterhouse for local meats
Lack of integration of animals due to percieved problem with manure- potential to document actual risk to food safety

Organic methods of worming livestock: pigs and sheep
Development of small local poultry processing facilities
Study on carbon sequestration of grass-fed meat: overall environmental impact, water use in grass-fed vs conventional cattle rearing
Ecological benefits of having animals grazing on ranch land
How to maintain native species while using land to graze
Community/environmental impact of slaughter houses (what models for small slaughter houses work?) (why aren't small slaughter houses making it?)

Processing

Shared processing facilities (ability to access processing facility without having to manage it) (Model facility in Watsonville operated by El Pajaro CDC)
Sourcing local organic berries (networking)
Development of co-packing facilities that will accept small batches
Looking at effects of food preservatives in organic body care*
Research on personal care products (body products) and organic preservatives*
organic pathogen reduction/ elimination methods and their effectiveness in processing
pesticide residue in wine (conventional vs. made with all organic)
Study on personal care effects on human health - conventional vs organic
Alternatives to amidated pectin stabilizers
Easy testing for yeast/bacteria for manufacturers

Water

Affordable water saving techniques (Determine price points where the technology pays for itself)
CROP Manage- Free Online Program Extension and RCS
Comparison of organic vs conventional water use

Other

Definitions of 'local' food
Collapse of markets due to retail consolidation (Whole Foods recently bought the local health food store and didn’t honor contracts with small local producers)
High cost of selling at farmers markets

Food hubs (there is one starting locally, need to streamline ordering and have a uniform consistent supply)
Organic hemp production (for fiber, textile and fuel)
Study on school lunches comparing kids eating organic vs conventional
Study on the effect of Roundup on gluten intolerance
Research on pesticide effects on pregnant women
Study of how many higher-education institutions have organic focused programs
Economic impact of organic agriculture vs conventional