



CCOF

Advancing organic agriculture through certification, education, advocacy, and 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-19-0038-0001

Re: Materials Subcommittee: Excluded Methods: Induced Mutagenesis and Embryo Transfer in Livestock Proposal

October 3, 2019

Dear Ms. Arsenault and NOSB:

Thank you for the opportunity to comment on the Materials Subcommittee's proposal "Excluded methods: induced mutagenesis and embryo transfer in livestock."

CCOF is a nonprofit organization governed by the people who grow and make our food. Founded in California more than 40 years ago, today our roots span the breadth of North America. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

CCOF commends NOSB's continued work on excluded methods. The Materials Subcommittee and NOSB's efforts are critically important in keeping GMOs out of organic farming and food in the face of increasing external pressure. The proposal is an important step forward because it clarifies which plant breeding methods involving mutagenesis are allowed in organic production and which ones should be excluded.

CCOF supports the conclusion that in vitro forms for mutagenesis do not meet the criteria adopted by the NOSB for determining genetic engineering, and therefore are excluded methods. Other types of mutagenesis, however, such as those occurring in nature or through use of chemicals, are either acceptable or need to be evaluated further.

CCOF also supports the recommendation to list embryo transfer or embryo transfer in animals as a "not excluded method" in the NOP excluded methods guidance because it does not meet the criteria of an excluded method.

Thank you for your review of our comments. Please do not hesitate to contact me for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Nell". The signature is fluid and cursive, with the first name "Peter" and last name "Nell" clearly distinguishable.

Peter Nell

Government Affairs Manager

cc: Kelly Damewood, CEO, CCOF, Inc.
April Crittenden, Chief Certification Officer, CCOF Certification Services, LLC
Rebekah Weber, Policy Director, CCOF, Inc.