



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 Discussion Document: Marine Materials in Organic Crop Production

October 3, 2019

Dear Ms. Arsenault and NOSB:

Thank you for the opportunity to comment on the Materials Subcommittee's discussion document "Marine materials in organic crop production."

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 supports the NOSB Materials Subcommittee's decision to keep the discussion document on marine materials open for further discussion. For reference, we have attached our full Spring 2019 NOSB comments on the discussion document.

CCOF does not support requiring organic certification of marine materials used in organic crop production under the wild crop standards. Although CCOF supports the goal of protecting seaweeds and marine materials from overharvesting, certification of marine materials to the wild crop standards cannot happen without either extensive, complex guidance on how the standards apply to the ocean or without a lengthy phase-in period to ensure that existing and new businesses can achieve compliance and that the organic farmers that use inputs made from marine materials can adapt to a newly certified supply chain.

The wild crop standards require producers to harvest from a designated area that has been free of prohibited materials for three years immediately preceding the harvest (§ 205.207(a)). Producers and certifiers cannot prove that portions of the ocean have been free of prohibited materials for three years.

NOSB should use an expert panel to identify which specific species are being harvested for crop inputs and whether those species are in danger of overharvesting and habitat degradation. As an alternative to requiring certification of marine materials as a blanket solution to overharvesting, NOSB should instead consider whether to prohibit specific species or materials from a specific region when scientific evidence demonstrates that the harvesting of these materials poses a significant risk of habitat degradation and destruction.

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.