



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-18-0029-0001

Re: Materials Subcommittee: Marine materials in organic crop production discussion document

October 4, 2018

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.

Although CCOF shares the concern that seaweeds and marine materials are under threat of overharvesting and habitat degradation or destruction, CCOF does not support requiring organic certification for marine materials used in organic crop production. Instead, NOSB should examine the feasibility of integrating fisheries certification, sustainability verifications, or attestations for all ocean-sourced inputs.

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 that reads "Peter Nell".

Peter Nell
Policy Specialist

cc: Cathy Calfo, Executive Director/CEO
Kelly Damewood, Director of Policy and Government Affairs
Jake Lewin, President, CCOF Certification Services, LLC

CCOF's Comments on Marine Materials in Organic Crop Production Discussion Document

The following comments are based on CCOF's member input, our experience offering organic certification for more than 40 years, and our certification of over 2,300 organic farms throughout North America.

- 1. Please discuss the feasibility of requiring all seaweed harvested for use in organic crop production to be certified to the wild crop standards.**

CCOF does not support requiring all seaweed harvested for use in organic crop production to be certified to the wild crop standards because the proposal recommends strict requirements that may not be achievable at scale for organic farming inputs. The discussion document notes that certifiers are currently certifying both wild harvested and cultivated seaweed to the wild crop standard and that those certifiers are having difficulty adapting the national organic standards to aquatic systems. To ensure that organic crop producers have sufficient access to inputs made from aquatic species, NOSB would need to conduct a comprehensive feasibility study as well as appropriate phase-in time periods.

Additionally, organic claims on input products are currently outside the scope of NOP enforcement. Therefore, it would be difficult for certifiers to verify input compliance to the wild crop standards.

A better alternative to organic certification for aquatic plant input materials may be phasing in a requirement that NOSB should consider establishing a goal of marine materials be sourced from third-party verified and/or certified sustainable fisheries in 10 years.

- 2. For certifiers currently certifying marine materials to the wild crop standard, please describe how you verify that biodiversity is conserved and how wildlife are maintained in the harvest areas.**

CCOF does not certify marine materials to the wild crop standard.

- 3. Could species be comprehensively listed on aquatic plant extract product ingredients?**

Some aquatic plant extract products listed on CCOF member Organic System Plans include species information on their Material Safety Data Sheets and product information sheets.

- 4. Would the establishment of a working group be useful in providing additional guidance on wild cropped and farmed marine algae and to clarify the definition and measurement of "not destructive to the environment" stipulated in the wild-crop harvesting practice standard §205.207 (b)?**

CCOF recommends that NOSB establish a working group to determine the feasibility of integrating fisheries certification, sustainability verifications, or attestations for all ocean-sources inputs into the national organic standards. For example, the Aquaculture Stewardship Council and Marine Stewardship Council maintain a joint standard for environmentally sustainable and socially responsible seaweed production (<https://www.asc-aqua.org/what-we-do/our-standards/farm-standards/seaweed-standard/>). The working group could determine whether existing standards align with the national organic standards. The working group could then recommend how to integrate and require marine sustainability programs into NOP standards, guidance, or instruction.

- 5. Is there a potential to replace marine materials with freshwater materials for crop production inputs? Many of these freshwater materials are invasive species and are already removed as part of restoration efforts.**

One CCOF member harvests freshwater materials for use in their compost and as an input for their organic production. The farmer harvests the naturally occurring freshwater materials from a pond on his property. It is unclear whether this example serves as a scalable solution for marine materials.