



# CCOF

Organic Certification

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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-16-0100-0001  
Re: Crops Subcommittee: Marine Algae Listing on the National List

March 30, 2017

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Crops Subcommittee's proposal "Marine Algae Listings on the National List."

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 opposes the proposal to add "*derived from brown seaweeds, class Phaeophyceae*" to the annotation for aquatic plant extracts. The proposal lacks information to justify the change to the National List. The proposal should explain the necessity of the annotation change, impacts to approved materials and producers who rely on those materials, and provide more information from the cited research on aquatic plant extracts.

Specifically, the subcommittee does not explain why it proposed to narrow the listing to only allow for brown seaweed. The current crop listings for marine algae is broad because it was intended to allow all species of aquatic plants; however, the proposal would significantly limit the definition to those derived from brown seaweeds. CCOF members commonly use aquatic plant extracts, including red seaweed. And the Organic Materials Review Institute (OMRI) lists several red seaweed products as approved for crop production. Moreover, the annotation change would exclude red seaweed products in crop production yet they would still be allowed in handling.

The subcommittee should also define the goal of the proposal. By comparison, the Handling Subcommittee issued a similar proposal with a goal of clarifying the Latin names of ingredients under informal names on the National List.

CCOF shares concerns about damage to global aquatic ecosystems from over-fishing and over-harvesting aquatic plants. All marine-derived materials used in certified organic production should be harvested in a sustainable manner in order to meet the requirement that materials on the National List not have adverse impacts on biodiversity. It would be most efficient to consider the broader issue of sustainable aquatic plant sourcing than take up this question for each individual species on the National List. Over time, the NOSB might consider a recommendation that mass-harvested aquatic plants be verified as sustainably harvested by a third party that maintains such standards.

Thank for your work on this issue. Please do not hesitate to contact me for more information.

Sincerely,

A handwritten signature in black ink that reads "Kelly Damewood".

Kelly Damewood  
Director of Policy and Government Affairs

cc: Cathy Calfo, Executive Director/CEO  
Jake Lewin, President, CCOF Certification Services, LLC