



CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy

March 19, 2013

Ms. Ann Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW.
Room 2646-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-12-0070; NOP-12-17

RE: NOSB Compliance, Accreditation and Certification Committee Agenda item: Calculating Percentage of Organic Ingredients in Multi-ingredient Products

Dear Ms. Arsenault and NOSB,

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on calculating organic ingredients. We appreciate your consideration of the public comments from the fall 2012 meeting. CCOF supports the nine resulting recommendations of the committee. The proposed regulatory changes, use of self-calculating forms, clarifications about salt, and specification sheets, along with the certifier's responsibility to confirm ingredient percentages, all align with best practices that CCOF and many other certifiers have adopted over the years.

In particular we applaud the acknowledgment that a product might contribute 100% organic content while not meeting the "100% organic" claim requirements, and that unprocessed agricultural products may be assumed to contribute 100% organic content. This recognition will help certifiers avoid a paper chase that adds no value to the system and will reduce the burden of certification on certified operations. The recommendation supports CCOF's *Practices Not Paperwork* initiative and the *Sound and Sensible* philosophy of the NOP.

While the development of sample calculation spreadsheets by the NOP might be useful, CCOF would prefer these forms not be required for use by all certifiers. Many certifiers have developed their own forms and should be allowed to continue to use them.

Again, CCOF thanks you for the opportunity to provide our comments, and the Compliance, Accreditation, and Certification Committee for their time and efforts on these complex subjects. We are available to answer any questions you might have about our comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Cathy Calfo".

Cathy Calfo, Executive Director/CEO

A handwritten signature in dark ink, appearing to read "Jake Lewin".

Jake Lewin, Chief Certification Officer

CCOF is a nonprofit organization founded in 1973. It is one of the oldest and largest organic certification agencies in North America. CCOF serves as a trade association for more than 2,600 certified organic producers and 300 supporting members in 38 states and 3 countries.