



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 Materials Subcommittee Proposal on Process for Limited Scope Technical Reviews

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Materials Subcommittee's proposal for updating the petition and technical review (TR) process.

This proposal appears to take on a very small part of the overall task of updating petitions and TRs. Other portions of this subject that have been mentioned in the subcommittee work plans include confidential business information in petitions, convening of technical advisory panels, revising the petition guidelines published as 72 FR 2167, and updating the policy manual on the subject of the roles of the NOP and NOSB in managing petitions. We would rather see this standalone part of the project withdrawn to become a future part of a larger update to the whole process.

Our reasons for these suggestions are two-fold. First, much of the content of this proposal is already covered in the new contract proposal for TRs that was implemented by NOP between the time this issue first came up and the present. Because contractors bid on each petition, there can easily be smaller scope petitions done for smaller amounts of money.

Secondly, this proposal is overly prescriptive in what questions a limited scope TR should address, and the evaluation questions only seem relevant to crops, not to handling issues. For instance, the handling subcommittee often has questions simply about whether the petitioned substance is allowed in food for the petitioned use. All three evaluation questions may not be needed for each petition, and there are other limited scope questions that may be important.

We agree with the concept behind this proposal in that some petitioned items do not need to have a full TR for the subcommittee to decide on a course of action. However, the whole petition and TR process in the Policy and Procedures Manual should be re-written with this issue as part of a step-by-step process, with the roles of the NOP and NOSB clearly spelled out in the initial assessment of each petition.

Again, CCOF thanks you for the opportunity to provide our comments, and the handling subcommittee for their time and effort on these complex subjects. We are available to answer any questions you might have about our comments.

Sincerely,



Cathy Calfo, Executive Director/CEO

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 three countries.