



March 19, 2013

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-So, Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-12-0070

RE: Materials Subcommittee Proposal: Process for Limited Scope Technical Reviews

Dear Ms. Arsenault:

Thank you very much for this opportunity to provide comment on the Materials Subcommittee Proposal on Limited Scope Technical Reviews.

OTA¹ is the membership-based business association for organic agriculture and products in North America.

OTA does not support the Proposal on Limited Scope Technical Reviews. While we agree with the intent of the proposal and we believe there may be instances where a limited scope technical review would be useful, we believe the proposal as written is too prescriptive, and is unnecessary at this time. We respectfully request that this proposal, as written, be withdrawn.

OTA agrees that a limited scope review initiated for the purpose of determining the classification of crop or livestock material may be useful. An initial review could determine the classification of a material, and the outcome may deem any further review unnecessary. For example, if a crops material is classified as non-synthetic, a full evaluation technical report would not be necessary because the material would not need to appear on the National List. The beginning of the background section sets this scenario up nicely. However, the proposal goes beyond the classification of a material.

The OFPA categories referred to in Evaluation Question #1 only pertain to Crops petitions, while the Handling Subcommittee may have other evaluation questions for limited petitions. Furthermore, the three evaluation questions may not all need to be addressed for each petition. These should only be examples of limited scope questions rather than a mandated exhaustive list.

¹ OTA is the leading voice for the organic trade in the United States, representing organic businesses across 49 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect the growth of organic trade to benefit the environment, farmers, the public and the economy.

The other concern we have is that a limited scope review is already covered in the new contract proposal for Technical Reports implemented by NOP between the time this issue first came up and the present. Therefore, this proposal may be unnecessary.

OTA recognizes that NOSB is working to update the petition and Technical Review process overall. In support of that work and the Board's efforts to create cohesive policy and procedure, we urge NOSB to withdraw this stand-alone proposal, and to focus on a more comprehensive approach that addresses the variety of subjects pertaining to petitions and Technical Reviews.

Again, on behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,



Gwendolyn Wyard
Regulatory Director of Organic Standards and Food Safety
Organic Trade Association (OTA)

CC: Laura Batcha
Executive Vice President
Organic Trade Association (OTA)