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Organic Certification

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September 30, 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-13-0049

RE: NOSB Crops Subcommittee on Sunset 2015 Review List

Dear Ms. Arsenault and NOSB,

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the 2015 Sunset Summaries for aqueous potassium silicate, sodium carbonate peroxyhydrate, and sulfurous acid.

CCOF does not have new information to provide on any of the three substances under review to warrant a new Tap Review or removal from the National List. In the case of sulfurous acid, we know that this material has significant use providing economic value on a variety of farms we work with. It has supported the development of organic berry and crop production in a number of regions. In the absence of compelling reasons presented by the community regarding the material's suitability criteria, we see no reason to remove it from the National List.

As discussed in our blog (www.ccof.org/blog/material-sunset-process-announced-usda-will-break-regulatory-logjam) we support the NOP's recently announced new process on Sunset Review. However, in the future, we believe the organic community may benefit from the opportunity to make more informative comments based on issues raised by third party Technical Review or new information being presented by the NOSB's assessment of these substances. Therefore, we encourage the NOP to request new Tap Reviews where information such as a new alternative material or a change to the use of a listed material may have occurred. The NOP can achieve this by providing thorough summaries and/or requests to the public for new information.

Given the new policy regarding Sunset materials, we expect that at the next NOSB meeting and comment period, the board will have to complete their review without the benefit of hearing responses to more targeted questions to stakeholders about their experiences with the materials.

To support the new NOP policy on Sunset Review, we hope that in the future more substantial summaries and technical reviews, where needed, are made available before the public provides input.



Again, CCOF thanks you for the opportunity to provide our comments.

Sincerely,



Cathy Calfo, Executive Director/CEO
CCOF, Inc



Jake Lewin, Chief Certification Officer
CCOF Certification Services, LLC

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.