



October 21, 2016

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-16-0049

RE: Handling Subcommittee – Marine Algae Listings on the National List (Discussion Document)

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Handling Subcommittee’s Discussion Document on the marine algae listings on the National List.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 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 organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

The Handling Subcommittee is presenting a brief analysis of its current understanding of the nine marine algae inputs on the National List and requesting public comment.

Marine Algae Listings: Aquatic plant extracts, alginic acid, agar-agar, carrageenan, alginates, beta-carotene from algae, kelp, seaweed (Pacific Kombu) and Wakame.

The topic areas for discussion are nomenclature, overharvesting, select harvesting practices and contamination. Depending on public comment, NOSB may develop a proposal to annotate some of the materials on the National List or clarify the naming conventions because some are duplicative and/or redundant. Alternatively, NOSB may recommend that the National Organic Program (NOP) provide guidance on the use of seaweeds in organic production.

The Subcommittee is asking the following specific questions:

1. Should the naming conventions of the marine plant/algae listings on the National List be consolidated and/or clarified to avoid redundancies and duplication using Latin binomials?
2. Should annotations be written to clarify specific uses, or harvesting guidelines for any of the marine algae listings, such as “no machine harvesting of *Ascophyllum*,” and “Not harvested from a conservation area identified by State, Federal or International bodies?”
3. Is there a need for further NOP Guidance on marine plants/algae?



OTA supports using Latin binomials for the naming convention of the marine algae listings on the National List, and we support all efforts to clarify and/or avoid redundancies.

We also generally share the concerns that have been voiced about the sustainability of production and harvesting methods used for marine algae listings on the National List. Therefore, we support the efforts of NOSB and the organic sector to move towards, over a reasonable time frame, the allowance of only marine algae species that are produced and harvested in accordance with recognized sustainable practice standards whether they be state, federal, international or private. We do not believe that production or harvesting practices should be specified in an annotation unless it cites an existing standard that an accredited certifier can verify through acceptance of a certificate of compliance or other similar verification document.

With respect to NOP guidance, we anticipate there would be a need for guidance or even a policy, particularly if the regulations were to recognize and reference existing marine algae harvest standards via an annotation. Guidance and/or a policy would help industry and certifiers comply with any restrictions or requirements that may be developed.

OTA encourages NOSB to develop a draft charter document (for public comment) that includes a mandate, list of objectives and a reasonable timeframe (short- and long-term) for completing.

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
Vice President, Regulatory and Technical Affairs
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association