



March 30, 2017

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2642-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-16-0100

RE: Crops and Handling Subcommittee – Marine Algae Listings on the National List (Proposal)

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Subcommittee proposals (Crops and Handling) addressing 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 over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

There are nine separate listings for marine materials on the National List, which are the subject of the identical proposals presented by the Crops Subcommittee and the Handling Subcommittee. In response to favorable comments submitted in fall 2016, NOSB is proposing to clarify the following marine algae listings through the use of Latin binomials:

- **Crops:** Aquatic plant extracts
- **Handling:** Alginic acid, agar-agar, carrageenan, alginates, beta-carotene from algae, kelp, seaweed (Pacific Kombu) and Wakame.

As stated in our fall 2016 comments, 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. Unfortunately, we did not have adequate time to carefully review the proposals and develop comments through our member engagement process. We respectfully request that NOSB consider and discuss the comments received for this meeting but table the proposal for another round of comments in fall 2017.

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,

A handwritten signature in black ink that reads "Gwendolyn V. Wyard".

Gwendolyn Wyard
Vice President, Regulatory and Technical Affairs
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association