



October 8, 2025

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP

Docket: AMS-NOP-25-0034

RE: Materials Subcommittee Proposal: Research Priorities

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Materials Subcommittee on its discussion document related to research. 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. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA appreciates the Subcommittee's thoughtful effort to advance research priorities that balance the needs and priorities of several sectors. We appreciate the creation of the Research Priority Framework and the efforts to set priorities. We particularly thank the Subcommittee for considering the suggestions we offered in response to Spring 2025 discussion document and inclusion of these topics in this proposal.

We offer two minor comments:

1. Organic Livestock: Expand Pork Priority to Include Beef

While the Subcommittee included beef in the summary section of the Livestock section, we note beef is missing from the expanded explanations text.

2. Recommendation on Structure

As we noted in the Spring, several of these priorities intersect across crops, livestock, and handling. For example, trade-related research (imports/exports, soy/corn deficits) cuts across all sectors. While we appreciate inclusion of our additional research priorities, and recognize inclusion of some of these in the broader "Systems" section of the Crop research topics, we reiterate our recommendation to create a "Cross-Cutting" category in the Research Priorities Framework to accommodate multi-sectoral topics that are currently difficult to classify but are of critical importance.



On behalf of our members, OTA thanks the NOSB and the Materials Subcommittee for your leadership on this issue. We are committed to supporting the development of robust research priorities to help advance the organic sector.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott Rice".

Scott Rice
Sr. Director, Regulatory Affairs
Organic Trade Association

cc: Tom Chapman
Co-CEO
Organic Trade Association