

September 22, 2019

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

**Docket:** AMS-NOP-19-0038

**RE: Policy Development Subcommittee – Policy and Procedures Manual Revision (Proposal)**

**Draft – For OTA Members Only**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Policy Development Subcommittee’s Proposal on revising its Policy and Procedures Manual. The Subcommittee is proposing a list of minor revisions and suggested changes as summarized in the table below. The Organic Trade Association supports all of the changes.

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.

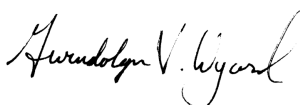
Section / Page	Proposed Change	OTA support?
III. D Page 8	Added to the NOSB Secretary’s duties: To monitor and notify Subcommittee Chairs periodically of public comments posted in the open docket between the period when the meeting notice is posted in the Federal Register and when the proposals are posted (pg 8).	Yes
IV. F. 1 Page 20	Clarified language about when the new NOSB Chair takes office to match the language that is in VIII. F.	Yes
IV. G. 2 Page 22	Another type of discussion document: Petition material discussion document	Yes

IV. H. Page 23	Clarified the steps in the material review process for a new petition	Yes
IV. H. Page 24 Steps 2 & 3	Added clarifying language about how a Subcommittee determines sufficiency of a petition	Yes
IV. H. Pages 25 - 26, Steps 4 & 7	Added a process for a Subcommittee to develop a discussion document based on a petition	Yes
VIII. E. Page 34	Added an additional bullet point under the section about the policy for public communication between NOSB meetings for posting discussion documents and proposals between public meetings for review and public comment	Yes

The proposed changes to the NOSB Policy and Procedures Manual are easily understood and consistent with our understanding of existing practice or practices intended to be carried out. We have no concerns or questions.

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