



April 4, 2019

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-18-0071

RE: Inadequate Public Comment Period for National Organic Standards Board meetings

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the spring 2019 National Organic Standards Board (NOSB) meeting.

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.

The Organic Trade Association again expresses its strong disappointment in the number of days given to the public to comment on NOSB's extensive packet of proposals and agenda topics. The proposals were made available to the public on the evening of, April 13, 2019, resulting in a **22-day comment period** (16 business days). The U.S. Department of Agriculture's (USDA) Agricultural Marketing Service (AMS) continues to release NOSB meeting materials a week to over a week late from the date that would provide a 30-day comment period. The shortened amount of time continues to be a disservice to NOSB members and the time and resources that go into NOSB's work. Typically, USDA releases an announcement when the proposals become available. However, to the best of our knowledge, a public announcement was not made around the proposals for this meeting. News of the proposals quickly spread via announcements made by organic stakeholder groups such as ours.

The Organic Trade Association now represents more than 9,500 businesses through direct membership and formal agreements with farmer-governed organizations that make up OTA's Farmers Advisory Council. As a member-based organization, our comments and positions take shape through our task forces and extensive outreach to our members. Prior to submission of final comments, draft comments are distributed to membership at least a week in advance of the comment deadline. The entire process takes a significant amount of time, especially when we are dealing with 17 complex topics, 51 Sunset materials and a 239-page packet.

To carry out a meaningful comment process under the Organic Trade Association's governance structure, a comment period needs to be **at least** 30 days. Given the number and complexity of topics that are



typically on any NOSB meeting agenda, we argue that with the number of topics that are included on every meeting agenda, even 30 days is inadequate, and the comment period should be extended to **60 days**.

The Organic Trade Association requests a longer comment time and a USDA public announcement when the proposals become available. A 22-day public comment period is not acceptable for the number and complexity of topics we are working with. It equates to an extremely unreasonable public comment opportunity and one that does not pay respect to the NOSB public comment process. The Organic Trade Association understands that this is not the fault of NOSB members. We write this comment as a call to action in the interest of correcting the deficiency. We urge NOSB and members of the organic community to voice this concern to USDA.

On behalf of our members across the supply chain and the country, the Organic Trade Association thanks the National Organic Standards Board 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