



October 4, 2018

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-18-0029

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

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the fall 2018 National Organic Standards Board (NOSB) meeting materials.

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.

OTA 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 released to the public on Wednesday, September 12, 2018, 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.

OTA 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 21 topics, over 40 Sunset materials and a 206-page packet.

To carry out a meaningful comment process under OTA'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 even 30 days is inadequate and the comment period should be extended to **45-60 days**.



For this fall 2018 meeting, a 22-day time allotment equates to an extremely unreasonable public comment opportunity and one that does not pay respect to the NOSB public comment process. OTA 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 unite and voice this concern to USDA.

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