



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: Petitioned Material Discussion Documents

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.

The NOSB fall 2018 meeting materials include several discussion documents for petitioned materials. OTA acknowledges and supports this new pre-proposal step for petitioned materials. The petitioned material discussion documents allow the public to weigh in on petitioned materials prior to the proposal stage, allowing more time to read and understand the petition, compile and share information with stakeholders, and develop feedback for NOSB to support its consideration of the petition. We hope that NOSB finds this process valuable and supports the continued use of this process for petitioned materials in the future.

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,

Johanna Mirenda
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association