



October 25, 2016

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket:** AMS-NOP-16-0049

**RE: Policy Subcommittee – Policy and Procedures Manual Revisions; Sunset Review Efficient Work Load Reorganization (Proposals)**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Policy Subcommittee’s Proposals on its Policy and Procedures Manual and the Sunset Review Work Load Reorganization.

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.

**Sunset Review: Efficient Work Load Reorganization**

OTA is supportive of NOSB’s efforts to improve the efficiency of the Sunset Review process as well as to distribute the workload. While we are interested in the solution, we are fairly neutral on the exact method used provided the following occurs: 1) every input on the National List is reviewed every five years; 2) every item on the National List is reviewed completely against OFPA and National List Criteria; and 3) the process is transparent, impartial and lends itself to a fair, objective and open public process with adequate time to comment. The Subcommittee’s proposal appears to meet these three criteria. We also strongly agree with the Subcommittee that materials reviewed early should be allowed to sunset on their original timeline (expiration).

**Policy and Procedures Manual Revisions**

OTA does not take any exception or object to the revisions that were made to the PPM or to the thinking of the Policy Development Subcommittee. We find the PPM to contain very useful and helpful information and appreciate its availability to the public, its function with respect to delineating policies and procedures, and the time and resources utilized to keep it current and relevant.



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,

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