



October 1, 2020

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

**Docket: AMS-NOP-20-0041**

**RE: Crops Subcommittee – Wild, Native Fish for Fertilizer Production (Proposal)**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the National Organic Standards Board (NOSB) Crop Subcommittee's Proposal on Wild, Native Fish for Fertilizer Production.

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.

For the fall 2020 meeting, the NOSB Crops Subcommittee presents its [Proposal on Wild, Native Fish For Fertilizer Production \(starts on Page 11\)](#).

OTA was not able to fully analyze the substantive new information in the proposal due to the conflict of the comment period with the NOP Strengthening Organic Enforcement Rule comment period. In our initial assessment of the proposed annotation language and new definitions, we identified one notable concern – the proposed definition of *fish waste* excludes an important waste stream from fish processed for *animal* consumption. More time is needed to further analyze the proposal and to understand the impacts it would have on the availability of essential fertility inputs for organic farmers. OTA recommends that this proposal be returned to the Subcommittee for continued work so that NOSB has the opportunity to receive and integrate stakeholder feedback into the final proposal.

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