

**Date:** October 5, 2020

**Docket:** AMS-NOP-17-0065

**Re: Strengthening Organic Enforcement Proposed Rule – Technical Corrections**

Thank you for this opportunity to provide comment on the United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS) National Organic Program (NOP) Proposed Rule on Strengthening Organic Enforcement. The Organic Trade Association is submitting individual comments on each topic in the proposed rule to help NOP in its process of finding and navigating our positions and recommendations. We have also submitted all of our comments bundled into a single PDF including a cover letter. This comment addresses Sections #19: Technical Corrections.

**Summary of the Organic Trade Association’s (OTA) Positions and Recommendations**

- OTA has no concerns with the proposed technical corrections, and recommends that these technical corrections be implemented immediately upon the effective date of the final rule.

**OTA’s Positions and Recommendations**

- OTA has no concerns with the proposed rule to change “produced” to “processed” in section §205.301(f)(2) and vice versa in §205.301(f)(3). These revisions are intended to better describe the application methods of ionizing radiation and sewage sludge, respectively. The current wording is the result of an erroneous error contained in a 2015 *Federal Register* publication<sup>1</sup>. The Strengthening Organic Enforcement Proposed Rule would return the wording back to how it appeared prior to the 2015 publication.
- OTA has no concerns with the proposed rule to change “205.200” to “205.201” in section §205.400(b) and §205.401(a). Accurate citations are critical. The Strengthening Organic Enforcement Proposed Rule would update the regulatory text to refer to the accurate citation Organic System Plan requirements.
- OTA recommends that these technical corrections be implemented immediately upon the effective date of the final Strengthening Organic Enforcement Rule.

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<sup>1</sup> <https://www.federalregister.gov/documents/2015/02/05/2015-02324/national-organic-program>

On behalf of our members across the supply chain and the country, the Organic Trade Association thanks the National Organic Program for your commitment to protecting organic integrity.

Respectfully submitted,

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