



October 8, 2015

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-15-0037

RE: Crops Subcommittee – Micronutrients Annotation Change Proposal

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the Crops Subcommittee (CS) and National Organic Standards Board (NOSB) on its proposal to change the annotation for the listing of ***Micronutrients*** at 205.601(j)(6).

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 the growth of organic trade to benefit the environment, farmers, the public and the economy.

Realistic and Appropriate Certification Requirements

OTA supports the CS proposal, which acknowledges that farmers use a variety of methods to determine if and when to use micronutrients for their crops. The current annotation which requires deficiencies be documented by testing overly restricts farmers' ability to use micronutrients. Allowing farmers to use all the methods available for determining crop nutrient needs (such as testing, observation, recommendations from consultants, and adoption of extension and university studies) will support their efforts to deliver proper nutrients to their crops that are essential for quality, yields, and disease and pest resistance. The proposed annotation retains specific language prohibiting certain types of micronutrients (nitrates and chlorides) and certain use patterns (defoliant, herbicide, and desiccant), which should continue to alleviate concerns about uses of micronutrients that would not be compatible with organic agriculture.

OTA supports the CS farmer-friendly proposal and urges the full Board to pass the recommendation for an annotation change to the listing for ***Micronutrients*** at 205.601(j)(6).

On behalf of our members across the supply chain and the country, OTA thanks NOSB for the opportunity to comment and for your commitment to furthering organic agriculture.

Respectfully submitted,



A handwritten signature in dark ink, appearing to read "Nathaniel Lewis", is placed over a light gray, textured rectangular background.

Nathaniel Lewis
Senior Crops and Livestock Specialist
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association