



April 14, 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-15-0085

RE: Crops Subcommittee – Squid and Squid Byproducts

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the Crops Subcommittee on its proposal to list Squid & Squid Byproducts at § 205.601(j) of the National List.

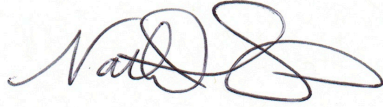
The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 states. Its members include growers, shippers, processors, 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.

OTA supports the subcommittee recommendation to list Squid and Squid Byproducts (pH adjusted) to the National List.

The subcommittee describes the ecological advantages that squid products provide to more commonly used fish fertilizers as justification for the products compatibility with organic principles. We agree. Additionally, as the organic industry continues to grow with specialty crops leading the growth curve, liquid fertilizer demand will increase as well. Through this growth in the industry, OTA wants to ensure that organic production maintains an ecologically sound approach to both the organic products themselves, as well as the inputs used to grow those products. Squid-based fertilizers appear to be an alternative to fish products that can support the growth of the industry and maintain the commitment to environmental stewardship that is a hallmark of organic production. We urge the full NOSB to approve the proposal and add squid and squid byproducts to the National List for use in organic crop production.

Again, 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,



Nathaniel Lewis
Senior Crops and Livestock Specialist
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association