



The Organic Specialists

April 12, 2016

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

Docket: AMS-NOP-15-0085

RE: GENERAL COMMENT ABOUT THE NATIONAL LIST PROCESS

Dear Ms. Arsenault,

We appreciate the extraordinary volunteer efforts by each member of the National Organic Standards Board (NOSB) and commend all of your hard work on behalf of the organic community. The complex and diverse questions being considered at the upcoming meeting in Washington, DC are well beyond what is normally requested of a Federal Advisory Committee.

We wish to make some general comments to the NOSB about the National List and the considerations that may go into your voting decisions as Board members.

We have noted a larger concern that emerges when reviewing the history of materials intended to help organic operations. We believe strongly that organic production methods need to be a progressive integrated system that allows for and adopts the most progressive tools available that are in alignment with organic principles and the National List criteria. The list was not intended to be limited to a select few materials that are only added if no other tools are available.

With that in mind, we would like to describe some issues of concern and some concepts that we believe are essential in considering decisions about materials and can help the health of the organic community. We ask that you consider them in your deliberations:

1. The National List (NL) is part of a toolbox for organic production and handling. Limiting the list or making it shorter or smaller is not automatically a goal, or likely to be helpful to the organic community in the long run.
2. The decisions about the list should be based on the needs and requirements of organic production and handling and the criteria for screening materials.
3. Putting too much emphasis on the very limited comments received during the 30-day public comment period is dangerous and is not in the best interests of the organic community. Public comments are useful in gathering information and understanding the issues, but need

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- to be put into perspective. Very few people actually even know about or have the time or inclination to comment. For example, our firm and our people are deeply interested in and committed to following these issues but even we have difficulty making thorough comments within the time constraints.
4. Relying on the number of comments received is a poor indicator of actual value or future value of a material. The idea that if few people or even no one submits a comment asking that a material stay on the list or affirms that it is in use or is still needed is not by itself a reason to remove it from the NL. The Board was appointed to also represent those who do not or cannot comment as well as those who are not yet involved in organic production or handling.
 5. The materials on the National List are screened by the strictest review of agricultural and food production methods in history. The criteria for determining compatibility with organic principles are thorough and quite restrictive.
 6. The decision about whether something should be on this very small list of synthetic or non-organic materials that MAY be used in organic production and handling is not a popularity contest of how many comments are received. The decisions should be based upon review against the criteria that intended to evaluate materials.
 7. Please ask yourself if the material could be of use in the future. It is very difficult to put it back on the list.
 8. Adding a material to the National List is a very long and arduous process, and removing something is not to be taken lightly.

Please don't limit our toolbox unnecessarily. We need to do everything we can to encourage more organic acreage in the US. Today's standard is stronger and more stringent each year. And far more restrictive than before 2002, despite claims to the contrary. We should be proud of the National Organic Program, the only public, transparent agricultural standard that is third party inspected from seed to table.

Over the years our firm has participated in petitions to remove materials from the National List as well as to add useful tools. We hope that you will take these thoughts into consideration as you prepare for and participate in the NOSB meetings and vote on the wide array of materials under consideration.

We recognize and appreciate the commitment of the NOSB members to consider the full range of stakeholder opinions and, through a deliberative process, without individual bias, make recommendations to advance the organic sector. Thank you.

Sincerely,

Bill Wolf, Katherine DiMatteo and Sandy Mays
Partners

The partners and associates of Wolf, DiMatteo + Associates have over 100 years of combined experience in the organic sector. We have served hundreds of farms and businesses with their organic production systems and regulatory compliance, both nationally and internationally. We have been involved in the founding of several key organic organizations including the Organic Trade Association, Organic Materials Review Institute and the Organic Center. We are fiercely committed to continual improvement and to provide our clients and the organic sector with the tools to advance organic, environmental, and social practices.