



April 1, 2022

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National Organic Standards Board  
USDA–AMS–NOP  
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Washington, DC 20250–0268

Submitted via [Regulations.gov](https://www.regulations.gov).

**RE: Docket # AMS-NOP-21-0087**

**NOSB Certification, Accreditation and Compliance Subcommittee Discussion on NOSB Technical Support Initiative**

Dear NOSB Members:

Thank you for the opportunity to provide comments on the NOSB Technical Support Initiative. MOSA certifies over 2,000 organic operations throughout the United States, including approximately 730 livestock operations, 1,750 crop operations, and 325 handling operations. We have been in attendance and offered input at most public NOSB meetings for over 20 years.

We continue to support the idea of additional technical support for NOSB work. Below we have some feedback on the questions for further discussion.

1. What are the advantages or disadvantages of having support come from within the government? From a nonprofit or university?

We don't have any direct perspective from which to answer this question. Tapping either of these sectors seems reasonable. We could imagine that government support might be easier to coordinate, while nonprofit or university-based support might have more direct knowledge regarding NOSB subject matter or be more invested in serving the organic community.

2. What NOSB tasks, if any, are critical to keep completely independent from the support team?

We think that summarizing public comments for Board member review would be better handled by Board members, who will likely be most familiar with the discussions at hand, and aware of important nuances that could be missed by a support team that is not as immersed in the discussions. Similarly, drafting language for proposals and recommendations would seem to require Board member's perspective and expertise.

For each of these, it's possible that support team assistance could be used. "Complete independence" is not a concern.

3. Should the support team be privy to all Subcommittee meetings and discussions?

We do not think that the support team should be privy to all Subcommittee meetings and discussions. Subcommittee members should be able to have frank, personal discussions and debates as they wrestle with various complex and sometimes divisive issues. Having additional support team persons present could hinder an open communication dynamic that seems important to the NOSB's quality work output.

4. What should be the scope of the NOP's relationship with the contemplated support group, i.e., should they be able to task the group directly?

We do not have concerns with the general concept of the NOP interfacing with the NOSB support team, especially if that helps with efficiency, and if the work tasks are less subjective in nature. However, we do support NOSB autonomy, as is addressed in the document. It seems the NOSB should be primarily involved in directing the work of its support team.

As always, thank you for all of the work you do for our organic community. Your service is important and valuable.

Respectfully submitted,

The MOSA Certification Team