



April 4, 2019

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National Organic Standards Board
USDA-AMS-NOP
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Submitted via www.regulations.gov

RE: Document # AMS-NOP-18-0071

NOSB Materials Subcommittee Discussion Document on Marine Materials in Organic Crop Production, February 12, 2019

Dear NOSB members:

Thank you for the opportunity to provide comments on the marine materials discussion document. MOSA certifies approximately 2150 organic operations throughout the United States.

We fully support the organic community's intentions to only allow aquatic plant-based inputs that are produced and harvested in a sustainable manner. However, we have limited exposure to many of the concerns raised in this document, and though we're offering some feedback from our limited perspective, we ask that this discussion be continued to allow more time to solicit opinions and feedback from experts.

Below are our answers to the documents questions for discussion.

1. If you are not in support of requiring organic certification, what approach do you support? Please describe the method for defining, measuring, and most importantly, enforcing, that the harvest would not be destructive to the environment under an alternative approach.

We generally support organic certification as a sound and consistent requirement for ensuring that natural resources are maintained and improved. We agree with previous comments as noted in the discussion document: certifiers would need additional guidance and training to improve our skills related to certification of aquatic environments. We also have some reservations about certification of wild aquatic systems, since, as noted in the document, ocean contaminants are highly mobile. We recognize that NOSB addressed aquaculture requirements around a decade ago. But, since then, our oceans have had increasing dramatic contamination threats, such as the Fukushima disaster, and effects from climate change. This gives pause and perhaps points to a need to reassess earlier NOSB work.

It's not uncommon that entrepreneurs and technological developments get out ahead of regulations. When that happens, enforcement becomes inconsistent and as better standards develop, they're challenged to regulate a market that has proceeded without adequate oversight. At this time, we do not have adequate National Organic Standards for certification of marine environments. That development would be needed before we could confidently support certification as a best answer to the environmental concerns around harvest of marine materials.

Further, we recognize that to require organic certification for inputs is a new step in our standards, and although the discussion document speaks to the implications of this discussion as a precedent, we wonder about potential inconsistency. We currently allow some other natural materials as crop inputs, some of which may come from production systems with their own environmental impacts. Examples could include manure from conventional operations, or other plant-based fertilizers.

2. Some existing wild harvest marine algae standards from other certifiers and third-party entities are listed in the Appendix. Please comment on strengths in these standards that could be adapted for NOP guidance. Please identify areas of weakness or areas that are not covered.

We do not have enough exposure to this type of production to provide an informed opinion.

3. What existing certification or private standards to support marine algae harvest sustainability have not been included in this document or the Appendix that can help inform the NOSB's understanding of the current work being done?

We do not have familiarity with other marine standards.

4. How many crop input products approved for use in organic production currently contain certified organic marine algae ingredients?

Our internal materials review database includes around 250 inputs with marine algae ingredients, but only approximately 15 are noted as *organic* marine plants. We are not requiring that these ingredients be certified organic, and don't currently require staff to indicate organic status in our database for crop materials.

5. Are there any crop input products utilizing or developing farmed marine algae?

We are unaware whether input products use farmed algae, since we do not track origination points.

6. Are there enough certifiers able to offer certification services to meet the needs of the crop fertilizer markets if organic certification were required? If organic certification were required of marine algae ingredients, what would be an appropriate phase-in time to allow markets to meet the demand?

Typically, we are able to scale up our staffing and expertise to meet market demands, and we'd tend to welcome a new market. This is good for our certification business, and it also steps toward our vision of a "thriving organic world." However, there is some uncertainty about the skills and guidance that would be needed to soundly meet demands for a new type of

certification, and how long it would take to be able to responsibly provide verification. We also have some questions about how a new demand for organic fertility inputs might impact other parts of the organic industry seeking similar products for different uses.

7. The NOSB hopes to convene an expert panel at the Fall 2019 board meeting to include a marine algae harvester for crop inputs, scientist, conservationist, and certifier, among others. What are some questions that could be posed to help identify the issues and solutions?

We don't have much background in this type of production to be able to formulate useful questions. However, we do wonder, if certification would be required, whether there would be enough organic material available to meet demands. We do not think there should be any allowance for use of a nonorganic input if organic is not available.

In summary, our industry needs more time to discuss the questions and assess the impacts that are nicely framed in this materials subcommittee document. We request that this discussion continue through the fall meeting. We support further discussion tools like use of an expert panel, or perhaps an industry task force.

We also had opportunity to read draft comments on this issue from the Organic Trade Association. We'd echo a lot of that thinking.

Thank you for your work on this challenging and perhaps precedent-setting issue.

Respectfully submitted,

The MOSA Certification Team