



# CCOF

Organic Certification

Education & Outreach

Political Advocacy

Promotion

September 30, 2013

Ms. Ann Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave., SW.  
Room 2646-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket: AMS-NOP-13-0049**

**RE: NOSB Materials Committee Proposal on Research Priorities for 2013**

Dear Ms. Arsenault and NOSB,

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the research priorities developed by the NOSB Materials Subcommittee. First and foremost, we want to express our support for the committee's time and consideration of research priorities. The research needs for organic farmers and processors continue to be significant, and feedback to researchers and research institutions, particularly the USDA National Institute for Food and Agriculture, the Agricultural Research Service, and university researchers on needs of the organic sector is incredibly valuable. We support the NOSB contributing to this input process by identifying issues that arose during NOSB deliberations. We are also supportive of the criteria being used to develop and vet research priorities.

In terms of the actual proposed priorities, we support the list of topics proposed and offer our support particularly for research in alternatives to antibiotics for fire blight. As we have articulated elsewhere, we strongly support antibiotics for fire blight being phased out of organic production, and we want to ensure growers have the tools to succeed in organic apple and pear production without antibiotics. We also want to express our support for research in alternatives to methionine, and evaluation of GMO vaccines.

Again, thank you for the opportunity to provide our comments, and the Materials Subcommittee for their time and efforts on research priorities.

Sincerely,

Handwritten signature of Cathy Calfo in black ink.

Cathy Calfo, Executive Director/CEO  
CCOF, Inc

Handwritten signature of Jake Lewin in black ink.

Jake Lewin, Chief Certification Officer  
CCOF Certification Services, LLC

*CCOF is a nonprofit organization founded in 1973. It is one of the oldest and largest organic certification agencies in North America. CCOF serves as a trade association for more than 2,600 certified organic producers and 300 supporting members, in 38 states and three countries.*

