



May 3rd, 2012

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-12-0017

RE: Materials Committee - Research Priorities Framework

Dear Ms. Arsenault:

Thank you very much for this opportunity to provide comment on the recommendation on Research Priorities Framework.

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 49 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 the growth of organic trade to benefit the environment, farmers, the public and the economy.

OTA is extremely pleased to see the Materials Committee Proposed Recommendation on Research Priorities Framework. NOSB is in an ideal position to hear and see the research needs of the organic sector as they relate to materials used in organic production and handling. NOSB's involvement will help bring about a regularly scheduled, public process to identify and communicate research needs.

A formalized process for collecting, prioritizing, and communicating research needs is critical to the dynamic organic food and farming sector. Our growth is rapid and constantly developing, both which need to be supported by the availability of new technologies, new farming methods and alternative materials. The immediate need for research and funding is evident by recent discussions and recommendations on methionine, tetracycline and streptomycin. While funding needs are apparent for many, the lack of research and results indicates the need for a more organized and aggressive approach. OTA believes the recommended framework will move us in that direction.

Again, on behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment and for your commitment to furthering organic agriculture.

Respectfully submitted,



Gwendolyn Wyard
Associate Director of Organic Standards and Industry Outreach
Organic Trade Association (OTA)

CC: Laura Batcha
Executive Vice President
Organic Trade Association (OTA)