



The Organic Specialists

March 19, 2013

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

Docket: AMS-NOP-12-0070

RE: Materials Subcommittee Proposal: Process for Limited Scope Technical

Dear Members of the National Organic Standards Board,

Wolf, DiMatteo + Associates (WDA) appreciates the work of the Materials Subcommittee on this topic however we do not support the Proposal on Limited Scope Technical Reviews. While we agree with the intent of the proposal and we believe there may be instances where a limited scope technical review would be useful, we believe the proposal as written is too prescriptive and is unnecessary at this time. We respectfully request that this proposal, as written, be withdrawn.

WDA agrees with the comments of the Organic Trade Association on this proposal including:

- A limited scope review initiated for the purpose of determining the classification of crop or livestock material may be useful. An initial review could determine the classification of a material, and the outcome may deem any further review unnecessary. For example, if a crops material is classified as nonsynthetic, a full evaluation technical report would not be necessary because the material would not need to appear on the National List.
- The OFPA categories referred to in Evaluation Question #1 only pertain to Crops petitions, while the Handling Subcommittee may have other evaluation questions for limited petitions. Furthermore, the three evaluation questions may not all need to be addressed for each petition. These should only be examples of limited scope questions rather than a mandated exhaustive list.

We deliver the strategic expertise to help organic, socially, and environmentally responsible products and projects reach their full potential—and flourish.

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- This proposal appears to be unnecessary given that a limited scope review is already covered in the new contract proposal for Technical Reports that was implemented by NOP between the time this issue first came up and the present.
- Since the NOSB is working to update the petition and Technical Review process overall, this stand-alone proposal does not contribute to a cohesive policy and procedures. Therefore, we urge the NOSB to withdraw this proposal and focus on a more comprehensive approach that addresses the variety of subjects pertaining to petitions and Technical Reviews.

Thank you for consideration of our comments. Wolf, DiMatteo + Associates (WDA) appreciates the opportunity provided through public comment to participate, as a stakeholder, in the unique National Organic Program public/private partnership.

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.