



# CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy



March 19, 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-12-0070; NOP-12-17**

**RE: NOSB GMO ad hoc Subcommittee Discussion on Excluded Methods Terminology**

Dear Ms. Arsenault and NOSB,

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the NOSB GMO ad hoc Subcommittee Discussion on Excluded Methods Terminology. We agree that there are contradictions in definitions of excluded methods, and there have been several recent examples of situations when lack of specificity of the terminology has caused different interpretations in organic standards.

We only offer a response to Discussion Question #1 regarding whether the definition of "excluded methods" in the Organic Rule needs revision. We strongly support updating the definition to offer clear, strong definitions that can guide industry and certifiers. It is critical that we, as a certifier, have clear guidance on how far back to verify that an organic product is made without GMOs so that we can implement the prohibition on use of genetically modified ingredients in a meaningful and consistent manner.

Again, we thank you for the opportunity to provide our comments, and the GMO ad hoc Subcommittee members for their time and effort on this complex subject.

Sincerely,

Handwritten signature of Cathy Calfo in black ink.

Cathy Calfo, Executive Director/CEO

Handwritten signature of Jake Lewin in black ink.

Jake Lewin, Chief Certification Officer

*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 3 countries.*