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September 24, 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

RE: Docket: AMS-NOP-12-0040  
NOSB CAC Sub-Committee Discussion Document  
**Implementation of Biodiversity Conservation in Organic Agriculture Systems**

Dear Ms. Arsenault and National Organic Standards Board:

Oregon Tilth Certified Organic (OTCO) supports the continued work of the Compliance, Accreditation and Certification (CAC) subcommittee on biodiversity. Conservation of natural resources, including biodiversity is a fundamental practice within organic agriculture systems. OTCO's commitment to natural resource conservation is evident through the Organic Conservation Program (OCP), a partnership with the Natural Resource Conservation Service (NRCS) aimed at building the capacity of the nation's conservation system to support organic farming.

Oregon Tilth believes that meaningful biodiversity conservation practices must be pertinent to organic operators, verifiable by certification agencies, and be promulgated by the NOP. To that end, OTCO would direct the National Organic Standards Board (NOSB) to written comments made by the Accredited Certifiers Association (ACA). We wholeheartedly support the ACA's comments on this very important discussion and would like to take this opportunity to reinforce the following points:

Guidance is needed from the National Organic Program (NOP) addressing their expectation for producers and certifiers regarding the conservation of natural resources and biodiversity. Although conservation is fundamental to organic production, the lack of any specific practice standard makes for difficult interpretation and thin enforcement. For instance, 205.200 is aptly titled "General". It is not by itself a practice standard. Instead it qualifies all other Organic Production practices in Subpart C to "maintain or improve the natural resources of the operation."

The "Biodiversity Conservation Assessment in Organic Agricultural Systems" developed by the Wild Farm Alliance (WFA) is not supported by 7 CFR Part 205 and therefore should not be included as part of the OSP. The inclusion of questions not supported by rule only muddles the intended purpose of the OSP.

OTCO supports using biodiversity considerations in material review. However the addition of questions intended to determine the positive impact a material may have on biodiversity is not consistent with the existing criteria for allowed and prohibited substances as articulated in section 205.601 of the NOS.

In conclusion, Oregon Tilth appreciates the work of the CAC subcommittee on this matter and we support the direction that the discussion is taking. It is our hope that natural resource conservation and biodiversity will be met by NOP with all the importance that it deserves.

Respectfully submitted,



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*Oregon Tilth, Inc. is a non-profit 501(c)(3) organization that supports and promotes biologically sound and socially equitable agriculture. Oregon Tilth offers educational events throughout the state of Oregon, and provides organic certification services to organic growers, processors, and handlers internationally. An NOP accredited certifier since 2002, Oregon Tilth currently certifies over 650 farms and ranches and over 600 handlers in more than 35 states affording us a broad perspective of current practices and challenges faced by organic producers and handlers.*