



503.378.0690
PO Box 368
Corvallis, OR 97339
organic@tilth.org
tilth.org

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Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.,
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

RE: Docket: AMS-NOP-22-0042, comments in response to

- Compliance, Accreditation & Certification Subcommittee (CACCS)
- Handling Subcommittee (HS)

Dear Ms. Arsenault:

Oregon Tilth thanks you for the opportunity to provide comments to the NOSB. We appreciate the work of the NOSB and its subcommittees and are grateful to have an opportunity to provide feedback. As always, Oregon Tilth supports the NOSB's work to improve and refine the organic system and its processes. We believe that collaborative actions that support and promote continuous improvement will result in a more robust, consistent, and beneficial system.

Compliance, Accreditation, and Certification Subcommittee

Proposal: Oversight improvements to deter fraud: Acreage Reporting

Oregon Tilth supports CACS's recommendation that certifiers list harvested acres by crop type and total certified acres on the organic certificate. Along with the rest of the organic community, we support increased mechanisms to deter fraud. Acreage reporting allows for increased traceability across the organic supply chain and the ability to determine if the number of acres can support claims around volumes of production.

Discussion Document: Oversight improvements to deter fraud: Minimum Reporting Requirements

Oregon Tilth supports the NOSB's work to improve and refine how the organic system combats the issue of fraud. We provide our comments and perspectives below, following CACS's questions.



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1. How could the NOP engage, facilitate, and help inform certifier exploration of universal documents like mass-balance and traceback worksheets?

We welcome the NOP facilitating the exploration of universal documents with certifiers. Perhaps the ACA could form a group to discuss best practices or common elements across certifiers as a first step and share with the NOP.

2. Is there any unforeseen downside to inspectors, reviewers, and certifiers all working with the same traceback and mass-balance templates?

We do not see any downsides to inspectors, reviewers, and others all working with the same traceback and mass-balance templates. We do, however, see many benefits and are supportive of more uniformity in forms. Many certifiers, including Oregon Tilth, have heard from inspectors that inconsistency among OSPs and forms create inefficiencies, frustrations and confusion. Common templates can lead to improved training and workflows.

3. Are there other forms (i.e., Dry Matter Intake (DMI) worksheet, Bills-of-Lading (BOLs), inspection report forms, etc.) that we can make universal to promote consistency for certifiers, inspectors, and operations?

Oregon Tilth sees benefit in creating consistency across most forms including the ones mentioned above like DMI worksheets. Standardized recordkeeping templates or forms such as livestock transport record keeping would also be beneficial.

Discussion Document: Organic and Climate-Smart Agriculture

Oregon Tilth applauds the NOSB members for their time and efforts to thoroughly articulate why classifying certified organic farming as “climate-smart” is sensible. We agree with the assessment presented in this Discussion Document. As clearly demonstrated, climate-smart agricultural practices are required by USDA Organic Regulations. We look forward to the continued dialogue between the organic community, NOSB, and USDA to ensure organic production systems are included in USDA climate-smart programs.



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Handling Subcommittee (HS)

Proposal: Ion exchange filtration - Recharge materials

Oregon Tilth supports the HS's recommendation that recharge materials used in the ion exchange filtration process must be listed on the National List. As noted by HS, Oregon Tilth and other members of the organic community have agreed with this assessment in previous comment periods.

Respectfully Submitted,

Oregon Tilth

Oregon Tilth is a leading certifier, educator and advocate for organic agriculture and products since 1974. Our mission to make our food system and agriculture biologically sound and socially equitable requires us to find practical ways to tackle big challenges. We advance this mission to balance the needs of people and the planet through focus on core areas of certification, conservation, policy and the marketplace.