



Accredited Certifiers Association
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October 1, 2020

Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standard Board
USDA-AMS-NOP 1400 Independence Ave. SW.,
Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Re: Docket Number: AMS-NOP-20-0041
Crops Subcommittee Proposal: Wild, native fish for liquid fish products
Material Subcommittee Proposal: Marine Macroalgae in Crop Fertility Inputs

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Crops and Materials Subcommittees on their work on fish and marine macroalgae used in organic crop production. The Accredited Certifiers Association (ACA) is a 501(c)(3) nonprofit educational organization created to benefit the organic certifier community and the organic industry. The ACA strives to ensure consistent implementation of the USDA Organic Regulations through collaboration and education of accredited certification agencies. We are committed to upholding organic integrity and maintaining stakeholder trust to facilitate the growth of the organic industry. Our organization is made up of 63 USDA NOP accredited certifying agencies worldwide, which includes all 47 accredited certifiers headquartered in the United States. We are the frontline decision-makers for the effective implementation of the National Organic Program.

The Crops and Materials Subcommittees have done extensive work on the fish and marine materials used in organic crop production. The Crop Subcommittee's proposal on **Wild, Native Fish for Liquid Fish Products** limits the allowance of liquid fish products at §205.601(j)(8) to those sourced only from fish waste, bycatch, or invasive species. The ACA has concerns about the ramifications of both this proposed annotation and the proposed definition of fish waste, which seems to exclude waste from animal feed production. Many organic crop producers rely on liquid fish products, and we are uncertain if the new annotation and fish waste definition will lead to the prohibition of many products, either because the product is not sourced from fish waste, bycatch, or invasive species, and from human consumption products only, or because the manufacturer is unwilling or unable to attest to this requirement.

Similarly, the Materials Subcommittee's Proposal on **Marine Macroalgae in Crop Fertility Inputs**, which sets harvest parameters for both synthetic aquatic plant extracts at §205.601(j)(1) and non-synthetic marine macroalgae (seaweed) at §205.602, would likely have an even larger



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impact than the proposed annotation change for liquid fish products. Kelp is an extremely commonly used crop input for organic producers. We do request clarification on the use of the term “marine” in this annotation, and whether the exclusion of freshwater macroalgae was intentional.

Since this is the first time the public is seeing either of these proposals, we request that they be extended until the Spring meeting to allow for adequate input. However, should either of these proposals pass, we would request that the NOSB recommend a long implementation period. Two years, similar to the implementation period for the use of organic kelp for livestock, may be sufficient to re-review and determine compliance for all currently approved liquid fish products and we support the lengthy phase-in period of five years proposed by the subcommittee for marine macroalgae. Because of the lengthy phase in period recommended, we encourage the crops subcommittee to recommend aquatic plant extracts for relisting (sunset 2022 material).

Sincerely,

Jennifer Berkebile

ACA Board of Directors Vice Chair
ACA Materials Working Group Facilitator
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