



MOFGA CERTIFICATION SERVICES, LLC.

Ms. Michelle Arsenault
National Organic Standards Board USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2642-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-18-0029

Re: Marine Materials in Organic Crop Production

Dear Ms. Arsenault,

Thank you for the opportunity to provide comments regarding the NOSB discussion document on Marine Materials and to the public comment questions posed in the document. MOFGA Certification Services (MCS) is a USDA-NOP accredited certifying body, wholly owned by the Maine Organic Farmers and Gardeners Association (MOFGA), certifying entities engaged in the harvest of seaweed and other sea vegetables for use as livestock feed and for human consumption.

Summary

- MOFGA and MCS supports the efforts of the NOSB to move toward stricter measurements for seaweed harvested for use in crop production, however requiring them to be certified organic does not seem to be the right approach.
- We support the development of guidelines for seaweed harvested for fertilizer production, similar to compost, where certifiers verify that the product is made according to the NOP rules. This could be managed with the development of an annotation for seaweed under §205.601 (j)(1).
- We strongly support the NOSB and NOP developing aquatic plant standards for animal feed and human consumption.

Please consider the following responses to the questions posed in the discussion document:

1. Please discuss the feasibility of requiring all seaweed harvested for use in organic crop production to be certified to the wild crop standards.

- We believe this would be hard to accomplish in practice. Our current sea vegetable buffer setbacks are significant and based on risk. We are worried that if all seaweed used for inputs in organic production require certification, it may push producers into pristine areas harvested now for certified organic production, at least in our geographic area.
- In addition, we worry what implication this is going to have on the requirements of other natural inputs used in organic crop production. Specifically, we are concerned that a step towards a requirement for organic crop inputs could spread to a requirement for organic compost feedstock, organic manure, or even organic straw when used as a mulch. Organic standards have always been written for farm products, not farm inputs. This is because organic standards are practice-based standards centered on

farming practices that build soil and other principles of organic production. In contrast, input standards are centered on avoiding the use of materials that disrupt the agroecology of the farm, the ecological balance of surrounding land, or the ecological balance of ecosystems related to the production of the input. We suggest that harvesting of marine organisms for use in production of farm inputs be regulated by standards specifically written to meet the basic principles used to review farm inputs for compliance, rather than organic production standards, because they can be specifically written to meet the needs.

- The feasibility of these requirements also begs the question of implementation worldwide and how enforcement would take place.
- We agree wholeheartedly with the sentiment of sustainable harvesting, though feel that this proposal does not consider the other aspects of the certification model as a whole.

2. For certifiers currently certifying marine materials to the wild crop standard, please describe how you verify that biodiversity is conserved and how wildlife are maintained in the harvest areas.

While we feel that our standards do uphold the requirements of §205.207, we recognize that further research is needed to determine if they are sufficient. These were developed and adopted through collaboration with another accredited certifier. We suggest that the NOSB continue to develop specific ocean-based harvest standards, instead of utilizing land-based standards, specifically in an effort to align sustainable harvesting of aquatic plants.

MOFGA Certification Services does certify sea vegetables as organic. The following inclusion is from our "Guidelines for Organic Sea Vegetables": http://www.mofgacertification.org/wp-content/uploads/Crop_2018_SeaVegetableGuidanceDocument-1.pdf.

NOP 205.207 – Wild-crop harvesting practice standard. *Harvesting shall be from designated areas that have had no prohibited substances, as set forth in NOP §205.105, applied for one growing cycle immediately preceding the harvest of the sea vegetables. Sea vegetables shall be harvested in a sustainable manner that is not destructive to the environment and will sustain the growth and production of the sea vegetables. Sea vegetables harvesting should follow the "Harvester's Field Guide to Maine Seaweeds" of the Maine Seaweed Council.*

There are other considerations than just the sustainability of harvesting this crop, primarily buffer setbacks from potential sources of contamination.

From our Sea Vegetable OSP Supplement:

Growing Area Description Cultured and/or Wild Crafted Sea Vegetables

- *Describe the natural environment of the harvest area.*
- *List any rare or endangered terrestrial or aquatic plants or animals that occur in the harvest area.*
- *Describe methods used to prevent negative impact to the harvest area and monitoring procedures used to verify lack of impact on the aquatic ecosystem, water quality and biodiversity.*
- *How do your harvest practices ensure the health, sustained growth, and long-term viability of the wild crop(s)?*
- *Approximately what percentage of the wild crop is harvested at each harvest?*
- *List training provided including frequency of trainings and the procedures used to ensure your collector's harvest crops in accordance with 3, 4 and 5 above.*

- *What procedures are in place to prevent contamination from adjoining land use or other sources of contamination?*
- *Describe your record keeping system for wild crop area management, monitoring, harvest and sales.*

3. Could species be comprehensively listed on aquatic plant extract product ingredients?

We support this, and the use of Latin nomenclature, but also wonder what comprehensively listed means. We understand “comprehensively listed” to mean that each seaweed species is listed by its Latin name on a product label.

4. Would the establishment of a working group be useful in providing additional guidance on wild cropped and farmed marine algae and to clarify the definition and measurement of “not destructive to the environment” stipulated in the wild-crop harvesting practice standard §205.207 (b)? Yes, this would be a very good idea.

5. Is there a potential to replace marine materials with freshwater materials for crop production inputs? Many of these freshwater materials are invasive species and are already removed as part of restoration efforts. We're unfamiliar with the ecology and composition of freshwater aquatic species, but would support research into this suggestion to determine if the final product would be equivalent in terms of micronutrients provided (e.g., iodine content) and if the harvest would be an overall ecological net positive.

Respectfully submitted,

Chris Grigsby
Certification Director
MOFGA Certification Services, LLC