



September 30, 2021

National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Washington, D.C. 20250-0268

*Re: NOSB Fall 2021 Docket No. AMS-NOP-21-0038*

PCC would like to thank the National Organic Program (NOP) and the National Organic Standards Board (NOSB) for the opportunity to provide comments on the NOSB's agenda and the NOP.

PCC Community Markets is the nation's largest community-owned food market, with nearly 100,000 active members, 15 stores across the Puget Sound region and close to \$400 million in sales. PCC's vision is to inspire and advance the health and well-being of people, their communities and our planet. It is our mission to ensure that good food nourishes the communities we serve while cultivating vibrant local, organic food systems.

Supporting the organic food supply system has always been a priority of PCC, because of the benefits that organic farming system and processing provide to the consumer and the environment. This is why we not only prioritize organic products and advocate for organic food systems at local, state, and national levels, but also voluntarily participate in the organic supply chain as a **certified organic retailer**.

As a part of our commitment to organic, PCC is a full member of the National Organic Coalition (NOC) and encourage members of the NOSB to review the detailed and collaborative comments submitted on behalf of all NOC members. On most of the topics, agenda items, and recommendations we agree with NOC and support their thoughtful and carefully crafted positions. On certain topics, however, PCC would like to provide our individual perspective, unique experience, or additional information to assist in NOSB deliberations:

## I. Organic as a Climate Solution

As we are all too keenly aware, climate change continues to be a global crisis requiring urgent action from all sectors, especially agriculture. We applaud the NOSB's letter to Secretary Vilsack concerning the ability of organic farming systems to contribute to climate change solutions through both greenhouse gas (GHG) emission reductions and carbon sequestration. While we recognize that there are improvements that could be made to the organic standards and program to strengthen its commitment to promoting climate-smart agricultural practices, we also agree with the NOSB that the organic regulatory framework and its practitioners have not been appropriately leveraged as an existing solution.

In addition to many of the recommendations the NOSB proposed in its letter, PCC would also support the development of clear soil fertility standards as required under the Organic Foods Production Act (OFPA) and an accompanying strengthening of the organic systems plan requirements and enforcement for those standards and other climate-friendly practices already required under OFPA. We would also like to see the development of a roadmap for organic producers of all sizes to participate in the carbon market schemes that are developing across the country, including most recently in Washington state. We understand that are potential pitfalls and concerns surrounding the carbon market schemes, but it is imperative that the organic producers that have been early adopters of and leaders in practicing climate-friendly agriculture not be left out of the benefits of these markets. Even more importantly, the organic community must have a voice in the creation of these markets to ensure true climate-friendly farming and prevent the false perpetuation of many large-scale, conventional farming practices as “carbon smart” or “regenerative.”

## II. Ammonia Extracts

When PCC asked a number of its local, organic producers if there was a need for ammonia extracts, the general consensus is best summed up by one farmer’s response: “Heck no! That stuff will mess up your soil!!”

As emphasized in the section above concerning organic as a leader in combatting climate change—doubling down on the organic programs soil fertility requirements must be a priority. As a part of that we must also strengthen our protections against practices or inputs that threaten soil fertility and the ecosystem balances that so many of our current organic producers cultivate and strive to protect.

Because the use of ammonia extracts is inconsistent with organic production principles and would run counter to the need for clearly defined soil fertility standards and practices to protect against climate change, we support the petition to include ammonia extracts on the non-synthetic inputs not allowed in organic list (§ 205.206).

## III. Carrageenan

PCC continues to support the removal of carrageenan from the national list as it remains an ingredient we do not permit in our stores in most products. Shoppers continue to voice their support for PCC’s prohibition of carrageenan and applying a “less-is-more” approach to food additive exceptions in organic.

As an aside, PCC would like to thank the NOSB for amending its carrageenan materials to remove the reference to “Irish Moss.” We believe this will avoid future confusion between this culturally significant, whole ingredient and the highly process extract of carrageenan.

## IV. Kasugamycin

As summarized for the NOSB in [our spring comments](#), most of the local apple organic producers that supply PCC (large and small) did not see a need for Kasugamycin to be added to the National List. Most producers emphasized that there were other ways of addressing the blight that did not require antibiotic treatments. Additionally, many producers expressed concern that the allowance of Kasugamycin and other antibiotic treatments in organic would harm the integrity of the organic program on which consumers and retailers rely.

Recent follow-up with key organic experts and stakeholders in the region confirmed these views and emphasize that the need for Kasugamycin is not seen. Given that Washington state usually produces about 90 percent of the U.S. organic apple supply,<sup>1</sup> we believe this is strong evidence that Kasugamycin is not essential and maintain our opposition to adding Kasugamycin to the National List.

## V. Fish Oil

PCC remains supportive of the effort to ensure that fish oil used in organic foods is sourced with minimal impact on marine ecosystems. As in the spring, we agree with the proposed annotation requiring fish oil to be sourced from by-product and that the source of the by-product be held to a strong sustainability standard. The challenge, as noted by many in the organic community, is in ensuring that any sustainable fishery standard identified aligns with the standards espoused by the Organic Foods Production Act (OFPA), its implementing regulations, and the expectations of the organic community and consumers.

Because of PCC's position as a leading grocer in the Pacific Northwest and Puget Sound, an area with deep cultural and economic ties to marine and aquatic ecosystems and all that depend on them, we work with some of the leading experts in the area concerning fishery conservation and management. It is through this continuing work and our efforts to develop the PCC Chinook Sourcing Standard that we are keenly aware that not all fishery standards are created equal.

With a lack of organic standards for both aquaculture and wild caught seafood, the only solution to establish a standard for fish oil at this time is to identify a third-party seafood sustainability standard. We recognize that there are limitations in scope for many of the strongest seafood standards out there, such as Monterey Bay Aquarium Seafood Watch, but we do advise caution in substituting a potentially lesser entity and standard to achieve the desired scope.

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<sup>1</sup> David Granatstein and Elizabeth Kirby, *Recent Trends in Certified Organic Tree Fruit in Washington State: 2020*, WSU-Center for Sustaining Agriculture and natural Resources in cooperation with Wa. St. Dept. of Ag., Oregon Tilth, and CCOF, slide 10, [https://s3-us-west-2.amazonaws.com/tfrec.cahnrs.wsu.edu/wp-content/uploads/sites/9/2021/03/WA\\_OrgTreeFruit\\_ann\\_rev\\_2020.pdf](https://s3-us-west-2.amazonaws.com/tfrec.cahnrs.wsu.edu/wp-content/uploads/sites/9/2021/03/WA_OrgTreeFruit_ann_rev_2020.pdf)

When we discussed the NOSB's proposal of using Global Seafood Sustainability Initiative (GSSI) as one of the approved sustainability standards with our partners at Seafood Watch they offered some interesting observations:

- GSSI is a collaborative effort by organizations in the seafood industry (including the Monterey Bay Aquarium) to build confidence in and promote certified seafood. Because of the collaborative nature of the organization, there are necessary compromises in the benchmarks schemes it establishes.
- GSSI does not evaluate fisheries or the sustainability of seafood, but rather whether other third-party sustainability certifiers meet its benchmarks as a certifier of seafood. A parallel in organic would be the accreditation of organic certifiers, except the benchmarks are not established externally by law.
- Not all GSSI-recognized certifications meet the higher sustainability standards of many of the participant groups/certifications. For example, Seafood Watch noted that they have their own benchmarking process that compares the certification and species in question to their standards and not all that have passed GSSI's benchmarks have passed Seafood Watch's benchmarks.

In other words, because GSSI is a collaborative benchmarking organization, it is not always the strongest standards/certification schemes that become the benchmark and thus not always the strongest certifications that receive approval.

In the context of fish oil, we recognize that any standard is better than the current lack of one and thus support the passage of the annotation. Looking ahead, however, we would encourage both the NOSB and NOP to develop organic standards for aquaculture and wild caught fish so that we can ensure that the standards we measure against meet organic stakeholder and consumer expectations. We would also encourage the NOSB to consider a note within its annotation that individual sustainability certifications approved by GSSI and ISEAL may be subject to individual review and prohibition if found to be inconsistent with organic principles and consumer expectation.

## VI. Oral and Written Comment Submissions

PCC does not support a move to entirely virtual comments as we believe that it would diminish organic stakeholder engagement and attendance at the NOSB meetings, especially if coupled with livestreaming meetings. We do, however, recognize the need for virtual accessibility in both oral testimony and meeting attendance to ensure that those with limited means, competing work demands, and or other limitations have a way to be heard and experience the collaborative NOSB process. For these reasons, we would recommend that once COVID-19 restrictions have subsided, testimony be offered in both pre-meeting virtual and in-person formats. So long as in-person testimony is maintained, we are supportive of live streaming.

Concerning the practice of scheduling multiple oral comments from a single organization, PCC supports the continued allowance of multiple oral comments from a single organization

because of the short timeframe provided for oral comments. Within the same organization, many individuals are specialists or experts that deserve a space to share their information and perspective with the broader organic community. Allowing multiple testimonies also allows for organizations that provide more extensive comments to highlight multiple key priorities and topics. That said, PCC would support a limit on the number of people, for example three to five, who may provide oral comments from the same organization to ensure that this allowance is not abused.

## VII. Research Priorities

PCC supports the consideration of all the identified additional research priorities, with a particular interest in the effects of organic crop production on water and a comparison of pesticide, antibiotic, and synthetic growth hormone residues in organic and conventional products. For the latter research priority, we would also advocate that organic should expand this testing to include pesticides used/allowed in organic as we have seen increased criticism from both organic opponents and sustainability allies that pesticide levels of permitted (but still potentially damaging) organic pesticides are not tracked and potentially pose a threat to consumers and biodiversity if used at improper levels.

Beyond the research priorities outlined by the NOSB, we would also advocate for the inclusion of the following categories:

- Expanding accessibility and removing barriers for black, indigenous, and people of color communities within organic.
- Heavy metal testing and identification of best practices for reducing heavy metal contamination in organic products.

## VIII. Conclusion

PCC would again like to thank the NOSB for the opportunity to provide these comments and for its continued flexibility and perseverance during these uncertain times. Maintaining the integrity of the organic label has never been more important. We are grateful for all your efforts towards achieving that goal and working towards the continuous improvement of organic that we all seek.

Sincerely,

**Aimee M. Simpson, J.D.**  
Director of Advocacy & Product Sustainability  
PCC Community Markets