

*Protecting,  
promoting and  
developing the  
organic seed trade*

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So, Ag Stop 0268  
Washington, DC 20250-0268

Docket: **AMS-NOP-15-0085**

Re: Policy Development Subcommittee –Sunset Review Efficient Work Load Reorganization  
(Discussion)

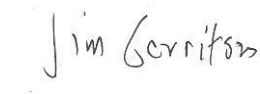
Dear NOSB and Ms. Arsenault,

*Organic Seed Growers and Trade Association (OSGATA)* is the farmer-controlled national non-profit membership trade organization of certified organic farmers, certified organic seed companies, organic seed professionals, affiliate organizations and individuals dedicated to the advancement of certified organic seed. *OSGATA* is committed to protecting, promoting and developing the organic seed trade and its growers, thereby assuring that the organic community has access to excellent quality certified organic seed, free of genetic contaminants and adapted to the diverse needs of local organic agriculture.

OSGATA respectfully submits the following comments regarding proposed changes to the sunset process:

The September 16, 2013, Federal Register Notice was a legislative rule issued without notice and comment as required by law. This legislative rule is currently the subject of litigation in federal court. OSGATA believes that during the pendency of the litigation, NOSB should not be recommending any further changes to the sunset process.

Respectfully submitted on behalf of OSGATA's certified organic members,



Jim Gerritsen, President  
OSGATA