



May 4, 2026

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

Via Regulations.gov Docket: AMS-NOP-25-0914

Dear Ms. Michelle Arsenault and members of the National Organic Standards Board:

The American Seed Trade Association (ASTA) welcomes the opportunity to submit comments to the National Organic Standards Board on strengthening and clarifying the seed usage requirements in certified organic agriculture. Our nearly 700 members represent companies and researchers involved in the production, distribution, plant breeding, and related activities that comprise the supply chain, for every kind of seed (grasses, forages, flowers, vegetables, row crops, and cereals) and across every production system (conventional, organic, and biotechnology). 95% of ASTA's active members are small businesses according to the Small Business Administration's categorization, while the total membership represents roughly 85% of all private seed companies operating in the United States. Because of this broad organizational composition, ASTA can offer an informative perspective on the topic of organic seed in certified organic agriculture.

Each sector within the industry has unique environmental challenges, production constraints, and business models. As a result, the membership has a diversity of viewpoints on organic production and the role that the sector plays in organic seed usage. Despite these myriad perspectives, the group agrees that the National Organic Standards Board (NOSB) should continue to consider this important subject and is grateful for its engagement on the topic, including the discussion documents at gatherings in 2024 and 2025. Additionally, the Board should engage with representatives of every kind of stakeholder, including organic farmers, organic and conventional seed companies, organic certifiers, and consumers. These entities can offer a wealth of knowledge and experience in organic seed policies.

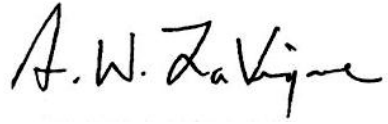
ASTA hopes that conversations between these groups can continue to take place at NOSB meetings. While an expert panel on organic seeds is a part of this upcoming gathering, ASTA hopes that future meetings will have the subject as an agenda item for more formal discussion. Because of the essential role that seed plays in the organic supply chain, discussions around organic seed production will lead to positive outcomes for producers and consumers alike while enabling the seed industry to play its role in the production system.

ASTA thanks NOSB for its consideration and longtime work to strengthen the organic industry.

Sincerely,

first-the seed®

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A handwritten signature in black ink that reads "A. W. LaVigne". The letters are cursive and connected, with a prominent loop on the 'L' and a long tail on the 'V'.

Andrew W. LaVigne
President & CEO