



# CCOF

Advancing organic agriculture through certification, education, advocacy, and promotion.

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

Docket: AMS-NOP-18-0029-0001

Re: Handling Subcommittee: 2020 Sunset Reviews

October 4, 2018

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the 2020 Sunset Review of handling substances on the National List of Allowed and Prohibited Substances.

CCOF is a nonprofit organization governed by the people who grow and make our food. Founded in California more than 40 years ago, today our roots span the breadth of North America. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

In the attached comments, we include the number of CCOF members who list the substance on their Organic System Plan (OSP) because it demonstrates the importance of the substance to organic production. Handlers use a range of ingredients and processing aids that are specific to the types of products they process and handle. Therefore, the NOSB should carefully consider the impacts of removing a substance that has been listed on an OSP because producers need a variety of tools available to them.

Our comments also describe how the substance is used by our members and, when possible, whether viable alternatives exist. This information is based upon our experience as a certifier and upon feedback from our members. Although we strongly encourage our members to comment, they do not always have the capacity to directly submit their own comments. Our goal is to relay valuable information about our members' materials and practices to help NOSB maintain a clear, consistent regulatory environment for organic producers of all scales and types.

Thank you for your review of our comments. Please do not hesitate to contact me for further information.

Sincerely,

A handwritten signature in black ink that reads "Peter Nell".

Peter Nell  
Policy Specialist

cc: Cathy Calfo, Executive Director/CEO  
Kelly Damewood, Director of Policy and Government Affairs  
Jake Lewin, President, CCOF Certification Services, LLC

## CCOF's Comments on the 2020 Sunset Review Handler Scope Materials

The following comments are based on CCOF's member input, our experience offering organic certification for more than 40 years, and our current certification of over 1,000 organic processors and handlers.

### **§ 205.605 (a) – Nonsynthetic nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food groups(s))."**

#### *Calcium carbonate*

5 CCOF members list calcium carbonate on their OSP. Calcium carbonate is used by fresh vegetable and rice processors and others. Calcium carbonate can be used as a dietary supplement, antacid, to reduce acidity in wines, food stabilizer, anticaking agent, and more.

#### *Flavors*

160 CCOF members list flavors on their OSP. Flavors are an important tool for organic processed food producers to create products that meet consumer taste expectations.

CCOF supports the recent NOP proposed rule to require a commercial availability requirement to flavors because it would likely increase demand and availability of organic flavors. CCOF recommends NOP issue NOP Handbook Guidance regarding commercial availability to increase consistency in how certifiers verify compliance with commercial availability requirements.

#### *Gellan gum*

1 CCOF member lists gellan gum on their OSP. Gums have unique properties and desired functions. Not all gums are interchangeable.

#### *Oxygen*

15 CCOF members list oxygen on their OSP. Oxygen is used by wineries, breweries, and manufacturers of carbonated beverages.

#### *Potassium chloride*

CCOF does not have members who list potassium chloride on their OSP. In the past, CCOF reviewed and approved potassium chloride as an ancillary ingredient in enzyme and calcium chloride materials.

### **§ 205.605 (b) – Synthetic nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food groups(s))."**

#### *Alginates*

No CCOF member lists alginates on their OSP.

#### *Calcium hydroxide*

5 CCOF members list calcium hydroxide on their OSP. Calcium hydroxide is also known as hydrated lime. CCOF members use calcium hydroxide as a processing aid for cheese production, dehydrated onion production, and tapioca dextrose production.

#### *Ethylene*

37 CCOF members list ethylene on their OSP. Ethylene is used to ripen avocados, bananas, and degreen citrus.

#### *Glycerides (mono and di)*

No CCOF member lists glycerides on their OSP.

*Magnesium stearate*

2 CCOF members list magnesium stearate on their OSP. Magnesium stearate is a binding agent. The CCOF members who use magnesium stearate manufacture pharmaceutical and dietary products.

*Phosphoric acid*

21 CCOF members list phosphoric acid on their OSP. Phosphoric acid is a sanitizer and cleaner. Producers only use phosphoric acid to clean equipment and surfaces that come in contact with organic product.

*Potassium carbonate*

18 CCOF members list potassium carbonate on their OSP. Wine producers use potassium carbonate to reduce acidity in wines which occurs when grapes mature slowly and accumulate high acid content during cooler years.

*Sulfur dioxide*

50 CCOF members list sulfur dioxide on their OSP. Wine producers use sulfur dioxide to prevent wine spoilage and oxidation. Producers may only use sulfur dioxide on wine labeled "made with organic grapes."

*Xanthan gum*

34 CCOF members list xanthan gum on their OSP. Gums have unique properties and desired functions. Not all gums are interchangeable. Xanthan gum is the most commonly used gum on the National List by CCOF members.

**§ 205.606 (g) – Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as organic.**

*Fructooligosaccharides*

No CCOF member lists fructooligosaccharides on their OSP.

**§ 205.606 (j) – Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as organic.**

*Gums: (Arabic, Guar, Locust bean, and Carob bean)*

5 CCOF members list Arabic, guar, locust bean, or carob bean gums on their OSP. Gums have unique properties and desired functions. Not all gums are interchangeable. Regarding the aspect of ancillary substances, CCOF reviewed and approved one gum product that was standardized with potassium chloride and sodium chloride.

**§ 205.606 (n) – Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as organic.**

*Lecithin – de-oiled*

6 CCOF members list lecithin on their OSP. Lecithin has various uses including emulsification, texturization, and more.

**§ 205.606 (v) – Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as organic.**

*Tragacanth gum*

No CCOF member lists tragacanth gum on their OSP.