



CCOF

Organic Certification

Education & Outreach

Political Advocacy

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-16-0100-0001
Re: Handling Subcommittee: 2019 Sunset Reviews

March 30, 2017

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the 2019 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 OSP because it demonstrates the importance of the substance to organic production. Producers may routinely use all or some substances listed on their OSP, or they may only occasionally use listed substances for specific emergency situations. Some substances are commonly used by organic producers while others are only listed by a few producers who rely on the substance for their site-specific conditions. 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.

Additionally, in our comments we describe how the substance is used and 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 throughout the nation.

Thank you for your careful review of our comments. Please contact me if you would like further information.

Sincerely,

A handwritten signature in black ink that reads 'Kelly Damewood'.

Kelly Damewood
Director of Policy and Government Affairs

cc: Cathy Calfo, Executive Director/CEO
Jake Lewin, President, CCOF Certification Services, LLC

CCOF's Comments on the 2019 Sunset Review Handler Scope Materials

The following comments are based on CCOF's experience offering organic certification for more than 40 years and from certifying 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))."

Attapulgate

Two CCOF members list attapulgate on their OSP. Attapulgate is used as a processing aid and functions as a natural bleaching clay for the purification of vegetable and animal oils. Our members use attapulgate for oil processing filtration.

Bentonite

39 CCOF members list bentonite on their OSP. Bentonite is essential to the wine industry to clarify wine. Wine consumers expect a clear wine without cloudiness or sediment. Bentonite can also be used in organic body skin care products as an oil absorber. No viable alternatives exist.

Diatomaceous earth

33 CCOF members list diatomaceous earth on their OSP. Wineries and oil producers use diatomaceous earth for filtration.

Nitrogen

124 CCOF members list nitrogen on their OSP. CCOF processors and handlers of all scales and types use nitrogen to process fresh vegetables, pack foods, cool or freeze products, and produce a wide array of products.

Sodium carbonate

Three CCOF members list sodium carbonate on their OSP. Sodium carbonate is used by CCOF members to clean fruit and remove mold. It is also used as a seasoning ingredient anti-caking agent.

§ 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))."

Acidified sodium chlorite

Nine CCOF members list acidified sodium chlorite on their OSP. They primarily use it as an equipment cleaner and sanitizer. It can also be used as a produce wash.

Chlorine materials - calcium hypochlorite, chlorine dioxide, sodium hypochlorite

330 CCOF members list calcium hypochlorite, chlorine dioxide and/or sodium hypochlorite on their OSP. Processors use chlorine materials in wash water to ensure that foods are safe to eat. Chlorine sanitizers are highly effective and ensure that processor/handlers meet food safety requirements.

Carbon dioxide

112 CCOF members list carbon dioxide on their OSP. Our members use carbon dioxide in a variety of situations. Carbon dioxide can be used to cool and store products, process fresh vegetables, add carbonation to beverages, and more.

Magnesium chloride

Four CCOF members list magnesium chloride on their OSP. Three CCOF members use magnesium chloride in tofu production to coagulate the bean curd and the fourth member uses it in a dietary supplement beverage. Magnesium chloride is one of three materials that allows for tofu production. CCOF's members typically use a magnesium chloride product which is produced from seawater. The method in which the seawater is processed must be examined to determine whether the substance produced is synthetic or not. If determined to be producing a synthetic substance, removing magnesium chloride from § 205.605 (b) and adding it to § 205.605 (a) would either have a small impact or result in CCOF members seeking an alternative supplier. However, without this material, organic tofu would not be in the marketplace.

Potassium acid tartrate

23 CCOF members list potassium acid tartrate on their OSP. Potassium tartrate is a natural byproduct of the winemaking process. Wine producers use potassium acid tartrate to adjust acidity in wines so that their wines meet consumer expectations for flavor. CCOF supports the reclassification of potassium acid tartrate as either agricultural or nonsynthetic to reflect the production methods used to produce potassium acid tartrate. Reclassification would require commercial availability verification and could create demand for organic potassium acid tartrate materials.

Sodium phosphates

No CCOF members list sodium phosphates on their OSP. Commonly it is used as an emulsifier in organic cheese products.

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

Casings

Four CCOF members list casings on their OSP. Casings are processed intestines of hogs, cattle, and sheep and are used by sausage makers.

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

Konjac flour

No CCOF members list konjac flour on their OSP.

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

Pectin (non-amidated forms only)

Four CCOF members list pectin on their OSP. CCOF has reviewed and approved four pectin products for use in jams and jelly products as a stabilizer and/or thickening agent. One CCOF member offers an organic citrus pectin product. A search of the marketplace indicates that sources of organic pectin exist but are limited.