



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

April 5, 2011

National Organic Standards Board
Spring 2011 Meeting
Seattle WA

Re HC: Use of Nutrient Supplementation in Organic Foods

Dear Board Members:

These comments are submitted on behalf of Beyond Pesticides. Beyond Pesticides, founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and groups around the world.

The Handling Committee has submitted a recommendation concerning nutrient supplementation in processed organic foods that would allow ingredients “required or allowed by law for the purpose of enrichment, supplementation or fortification of foods.” We are very concerned that this presents the potential for widespread incorporation of non-reviewed synthetic substances in foods which carry the organic label.

The recommendation proposes that any nutrient, vitamin, or mineral – whether natural or synthetic – which is considered beneficial for human nutrition should be allowed in processed food labeled as organic. The Committee refers to the use of these materials being “supported by the FDA and the Institute of Medicine of the National Academies.” It is important to note, however, that simply because a nutrient is deemed beneficial for human nutrition, by the FDA or any other body, this does not mean that this ingredient should be included to fortify any and all food products which may be available. It certainly does not mean that these ingredients *must* be included in the processed form of a product, particularly if that product is intended to go through a strict review process, such as that outlined by the *Organic Foods Production Act* (OFPA).

Adoption of this recommendation would effectively give blanket approval to an entire group of synthetic ingredients for use in organic food. It would subvert the layers of scrutiny which organic consumers expect for their food by exempting these additives from the evaluation to which all other synthetic substances are subjected through the organic review process. The spirit of OFPA suggests that there are, ideally, no synthetic substances in organic food or production, but that, if they are deemed necessary, they must be subject to review. This is the very reason that the organic standard was created.

The Committee, in making its recommendation, seeks to “harmonize the rules on fortification, supplementation and enrichment of organic food products with the rules governing other foods.” However, it is the precise intent of OFPA to create a *separate* review process

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resulting in *separate* rules for the production and processing of foods that carry the organic label. To “harmonize” organic rules with those governing non-organic foods ignores the spirit of organic food production, which intends to utilize non-synthetic materials whenever and wherever possible. By not allowing nutrient materials to go through the National List process, the Board’s ability to ensure that viable, non-synthetic options are always taken advantage of is severely curtailed.

For these reasons, Beyond Pesticides urges the Board to reject the Committee recommendation to amend the annotation for nutrient supplementation in organic foods. Organic consumers neither want nor expect synthetic materials to be incorporated into their food and therefore expect a rigorous review to ensure full benefits to human health and to minimize the ecological consequences of healthy diet.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry Shistar".

Terry Shistar, Ph.D.
Board of Directors