

# Public Comment Summary

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Comments submitted before October 1.

## Materials Subcommittee

### Research Priorities

5 organizations and 4 consumers commented. 4 organizations (Beyond Pesticides, Organic Trade Association, Organic Center, and CCOF) and 4 consumers support the priorities proposed by the Materials Subcommittee (MS), but most suggest additional topics or highlight specific topics.

1 organization (Organic Produce Wholesalers Coalition) proposes that one of the NOSB Research Priorities be support of an analysis of the impacts of the decisions on both antibiotics in the marketplace.

Other topics proposed were: chlorine alternatives, sulfuric acid alternatives, biodegradable biobased bioplastic mulch, mined minerals, chelating agents, organic control of citrus greening, impacts on bees and other pollinators from EMFs from cell phones and other sources, and adulteration of honey.

CCOF particularly supports research in alternatives to antibiotics for fire blight, alternatives to methionine, and evaluation of GMO vaccines.

### Confidential Business Information

Support Materials Subcommittee (MS) proposal: 4 consumers; 1 organization (Beyond Pesticides)

Oppose MS proposal: 1 organization (Organic Trade Association)

Those who support the MS proposal say that transparency in materials review is an important part of the public's demand for organic food, that detailed proprietary information is not required for review, but that the NOSB needs access to information that allows it to determine whether materials meet OFPA criteria.

OTA says it cannot support a recommendation that does not include protections for confidential business information in petitions. A potential solution to this problem could be found in the Technical Review process. A robust and accredited Technical Review process would allow for appropriate review while protecting confidentiality interests. They request that the Board consider their proposal to allow NOSB access to necessary information and protect a petitioner's confidential business information.

### Petition and Technical Review Process

Support MS proposal: 1 organization (Beyond Pesticides)

Oppose MS proposal: 1 organization (Organic Trade Association)

The points in support of the MS proposal are that the changes are needed to implement the changes of the CBI recommendation, incorporate the policy on ancillary ingredients adopted in April, and make additional clarifications of procedures.

OTA proposes changes to the Technical Review process to allow for appropriate review without revealing CBI.