

## Handling Committee

### *Carrageenan*

We oppose the recommendation of the Handling Committee to list carrageenan on §205.605(b). Carrageenan is an unnecessary synthetic material. There is significant research to suggest that the consumption of carrageenan may have adverse effects on human health and there are adverse environmental impacts in both its over-harvesting and production. Therefore, we urge you to reject the recommendation of the Handling Committee and remove carrageenan from the National List.

We agree with the committee's reclassification of carrageenan as a synthetic.

The Handling Committee recommendation does not address the significant health concerns about carrageenan, referring only to its allowance by the Food and Drug Administration. As we have previously stated in comments on many other substances considered by the Board, the allowance by another federal agency should not be considered sufficient to meet the criteria for being allowed in organic production or products. Many substances and ingredients that are allowed by other federal agencies such as the FDA are routinely criticized for their potential health impacts. Additionally, organic food is marketed to consumers as meeting higher standards than other food, so allowing materials into organic simply because they are already allowed in non-organic food fails to live up to what consumers logically expect from organic.

## Crops Committee

### *Inerts*

Food & Water Watch supports the Crops Committee proposal to deal with former List 3 "inerts" as individual chemicals. The committee recommendation lays out the long history of this process, which shows that List 3 inerts were to be individually reviewed years ago. We urge the committee to review these chemicals according to schedule.

Because so-called "inert" ingredients in pesticide formulations are not actually inert, it is unacceptable to treat them as a group without evaluating the characteristics of each one to see if the criteria of OFPA are being met. Each one must be reviewed and must not be given a special status because they appear on a list from the Environmental Protection Agency that is widely regarded as ineffective and outdated.

In addition to promptly reviewing the chemicals on the former List 3, we urge the Board to develop a plan for evaluating the inert ingredients formerly on Lists 4A and 4B as soon as possible.