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May 3, 2012

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-So, Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-12-0017

RE: Handling Committee Recommendations

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board.

QAI appreciates the work done by the Handling Committee reviewing the Sunset materials and submitted petitions. We offer the following comments for consideration:

Sunset Materials

QAI understands the committee decision to reclassify carrageenan as a synthetic. We are concerned, however, that the timing of this addition to 205.605(b) will not coincide with the inevitable sunset of the material off 205.605(a). Carrageenan is a popular material used in processed organic foods in the market today and the temporary loss of this material from 205.605 would have a significant impact on the organic industry. Therefore, we request the NOSB vote to maintain carrageenan on 205.605(a) until the next sunset period in addition to the vote to add carrageenan to 205.605(b). Given that 205.605(a) is the non-synthetic classification we see no concern in maintaining it on the list.

QAI supports the Handling Committee recommendations for the renewal of cellulose, glucono delta-lactone and calcium sulfate to the National List.

Petitioned Materials

As a Third Party Certification Agency, QAI's position is not to advocate for specific materials to be added to the National List. We strictly evaluate compliance of operators to the National List and attempt to minimize the impact on our operators by potential changes in the regulatory landscape.

In light of some petitions placed before the Handling Committee, we would like to take this opportunity to remind the NOSB of the historic equivalency agreements reached this year and in recent years with the European Union and Canada and how these agreements could be used to inform NOSB decisions.

- The handling Committee is recommending that two materials, Inositol and Choline, be