

## **HANDLING COMMITTEE**

### **CARRAGEENAN**

NOC agrees with the Handling Committee's recommendation to re-classify Carrageenan as synthetic – given ample evidence presented in the TR.

NOC disagrees with the Handling Committee recommendation to continue the allowance of synthetic carrageenan and re-list carrageenan on the National List, now at §205.605(b). It is clear from many reviews of Carrageenan that there are alternative materials that currently exist, serve the same function, and are currently being used in identical products. In addition, there is significant research to suggest that the consumption of Carrageenan in products may have adverse effects on human health, and there are adverse environmental impacts in both its over-harvesting, and production (alkaline) waste products.

Unfortunately, the Handling Committee recommendation does not address the significant health effects, referring only to allowance by FDA. We reiterate an oft-repeated statement of NOC that allowance by another federal agency of any substance or material being examined by NOSB in no way should confer safety, health, or environmental sufficiency required by OFPA evaluation.

For an in-depth (and well-documented) discussion of the health effects, including the presence of carcinogenic degraded carrageenan in food-grade carrageenan, we refer you to comments by the Cornucopia Institute. For a discussion as to environmental impacts, we refer you to the comments of Beyond Pesticides.

### **GIBBERELIC ACID**

NOC urges the NOSB to wholly reject the petition for listing gibberellic acid for a postharvest use.

- NOC agrees with the Handling Committee's findings that gibberellic acid should not be allowed for postharvest use on citrus, based on information that the material reduces the nutritional content of citrus fruit.
- NOC agrees with the Handling Committee that the petition does not make an adequate case for the need for gibberellic acid for postharvest use on pineapples.
- NOC *does not agree* with the recommendation by the Handling Committee that supports use of gibberellic acid for postharvest handling of bananas, for the reasons described below.

We base our opinion about the postharvest use of gibberellic acid on bananas on information contained in the comments of Organically Grown Company (OGC). OGC polled farmers who produced millions of pounds of organic bananas for sale in the US and learned that the farmers currently employ cultural practices, such as managing soil

fertility and careful attention to field sanitation, to control diseases that affect bananas during shipment. These agricultural management practices, coupled with good sanitation during harvest and packing, were sufficient to control black sigatoka, which is specifically mentioned in the Technical Evaluation Report as an example of the need for post harvest application of gibberellic acid.

NOC asserts that control of postharvest diseases on organic produce must begin in the field. The NOP regulations lays out a step-wise approach for disease control in §205.206, which specifically requires the use of soil and crop nutrient practices (§205.206.a.1), sanitation measures to remove disease vectors (§205.206.a.2), and management practices which suppress the spread of disease organisms (§205.206.d.1).

NOC concludes that since banana producers report that careful management of field systems provides sufficient control of postharvest disease, there is no need to add a postharvest spray of a biologically-active plant hormone on organic bananas just prior to shipment for sale to consumers.

## **POLICY DEVELOPMENT COMMITTEE**

### **PUBLIC COMMUNICATION**

We heartily endorse the Board's clarification as to 1) their role in communication with the Secretary of Agriculture; and 2) the ability of the public to communicate at any time with the Board.

It is the statutory responsibility of the NOSB to communicate to the Secretary on any and all issues relating to organic that the Board deems important. Additionally, it is necessary that NOSB communicate issues of concern directly to the Secretary regarding organic that they have heard from the public, whether or not it is the subject of a proposed regulation, standards, or recommendations.

NOC greatly appreciates the statement of commitment to communication with the public in this Recommendation. We note a long history – from the inception of NOSB – of members working with the public on various issues, and feel that codification of that process now seems appropriate.

### **CONFLICT OF INTEREST**

NOC fully supports the NOSB Policy Development Committee in seeking to enhance the Board's existing conflict of Interest (COI) policy. Adding clarity to both the definitions and to the procedures for the Board to follow not only guarantees consistency for this current Board, but adds guidance for all future Boards. We applaud your work on this and feel it is very important to complete.