



P.O. Box 11558, Eugene, Oregon 97440-3758 USA
541.343.7600 • fax 541.343.8971
info@omri.org

**Comments of the Organic Materials Review Institute
Spring 2012 National Organic Standards Board Meeting
Albuquerque, New Mexico May 22-25, 2012**

The Organic Materials Review Institute (OMRI) thanks the National Organic Standards Board (NOSB) for the opportunity to comment on items in this meeting's agenda [Docket No. AMS–NOP-12-0017]. OMRI is an independent non-profit institute that provides professional, independent and transparent review of materials and processes to determine their suitability for producing, processing, and handling organic food and fiber. OMRI was started in 1997 by a partnership of certifiers, the industry, and organizations that have an interest in organic farming.

Curry Leaf Petition

This recommendation mistakenly classifies curry leaf as 'nonsynthetic' instead of 'agricultural'. We understand that the NOSB Policy and Procedures Manual stipulates that the NOSB first classify any material as "nonsynthetic or synthetic" before voting to add it to the National List. However, in this case, it is essential that you also classify it as "agricultural".


Gibberellic Acid Petition

Commercially branded gibberellic acid products that may be used for post-harvest banana production all contain inert ingredients. In the U.S., growth regulators such as gibberellic acid are regulated as pesticides by the EPA, and thus, for pre-harvest crop production, OMRI allows inert ingredients from 2004 EPA List 4. However, for post-harvest use of direct food contact materials, OMRI requires that all ingredients of the branded product be on the National List at 205.605 or 205.606, or be certified organic, if agricultural. Thus, OMRI would be unable to approve a gibberellic acid brand name product for the recommended use because most appropriate inert ingredients used in commercial formulations are not on the National List at 205.605 or 205.606. OMRI strongly suggests annotating this material such that it may be a useful production tool. Although we don't endorse any particular annotation, we suggest the following:

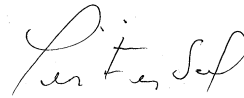
Gibberellic acid – for post-harvest banana use only; may only be formulated with 2004 EPA List 4 inert ingredients

Please note that the recommendation to add this nonsynthetic material on 205.605(a) indicates that other similar materials for post-harvest use should be petitioned as well. For example, nonsynthetic pyrethrum is commonly used for post-harvest grain storage, but also must be formulated with inert ingredients in order to be commercially viable. OMRI would like the committee to discuss the implications of adding this material onto 205.605(a) for post-harvest

use so that we can fully understand our responsibilities in reviewing similar products in the future.

A handwritten signature in black ink that reads "Peggy Miars". The script is cursive and fluid.

Peggy Miars
Executive Director/CEO

A handwritten signature in black ink that reads "Lindsay Fernandez-Salvador". The script is cursive and elegant.

Lindsay Fernandez-Salvador
Program Director