



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 Petitioned Materials recommendations: Choline, Inositol, Gibberellic Acid, Citrus hystric, Curry leaves (*Murraya koenigii*)

Dear Members of the National Organic Standards Board,

Wolf, DiMatteo + Associates (WDA) appreciates the opportunity to comment on the recommendation made by the Handling Committee regarding the following materials:

**Choline** – WDA agrees with the Committee that this material is a synthetic based on the review of the manufacturing process and all the substances used in the process. WDA supports the Committee’s recommendation to allow the use of choline in infant formula labeled “organic” or “made with organic.” We do not support the Committee’s recommendation to restrict the use of choline to the “made with organic” labeling category for products that are not infant formula. Although choline is not a required nutrient supplement for children, young adults and infants, there is sufficient data that demonstrates choline is an essential nutrient regardless of age and that most diets do not provide the minimum recommended amounts of choline.

The Institute of Medicine of the National Academies (IOM) recommended intakes for choline are:

- 250 mg/day for boys and girls 4 to 8 years of age;
- 375 mg for boys and girls 9 to 13 years of age; and
- 550 mg for men and women is 425 mg (in all age groups).

In October 2011, the Agricultural Research Service of USDA published a report entitled “Dietary Intakes of Choline: What We Eat in America, NHANES 2007-2008” which includes the following findings:

- Mean intakes for boys 6 to 11 years hover around 250 mg/day; those for girls hover around 200 mg/day.
- The mean intakes of girls 12 to 19 years of age are just a little over 200 mg/day.
- For individuals 20 years of age and older, estimated mean daily intake of choline was 396 mg for males and 260 mg for females.

Clearly, most children and adults are not consuming adequate amounts of choline through their diet therefore supplementation of food products, including organic food products, will benefit the overall health of individuals and the prevention of disease.

WDA requests that the Handling Committee reconsider its recommendation and allow the use of choline for infant formula and for all food products labeled as “organic” and “made with organic” so that consumers can choose organic products that are nutritionally equivalent to their conventional counterparts.

**Inositol** – WDA supports the Committee’s recommendation to add inositol to the National List 205.605(b) for use in infant formula labeled organic or made with organic (specified ingredients or food group(s)). Infant formulas are regulated by the Food and Drug Administration (FDA) and inositol is currently listed in the FDA’s Infant Formula regulation, as an essential vitamin required to be declared on the label, at 21 CFR 107.10, and to be added to non-milk-based infant formula, at 21 CFR 107.100(a). In addition, the FAO/WHO Codex Alimentarius Commission has an international standard for infants that requires a minimum level of inositol in all infant formulas and sets a guidance upper level. Without an allowance for inositol, infant formulas that otherwise comply with the NOP Rules would not be able to label their products “organic” or “made with organic” and still remain in compliance with FDA requirements. Also without this allowance parents will not have the choice to purchase “organic” or “made with organic” infant formulas that are nutritionally equivalent with non-organic infant formulas.

WDA does not have an opinion on the Committee’s recommendation to allow the use of inositol in food products, other than infant formula, labeled as “made with organic.” The petition submitted to the NOSB was only for infant formula and the information provided in the petition does not address the use of inositol in other food products. Until such time as inositol is petitioned for additional uses, it seems unnecessary to make such a decision at this time.

**Gibberellic Acid** – WDA supports the Committee’s recommendation to add gibberellic acid to the National List section 205.605(a) for post-harvest use on bananas only. It is our understanding that most gibberellic acid products that are sold for this use are formulated containing inert ingredients. Currently the National List does not include an allowance for inert ingredients in materials used in handling operations and listed in Section 205.605 of the National List. Furthermore the review process of inert ingredients is under discussion by the NOSB. Therefore, WDA supports the OTA suggestion to revise the recommended annotation to read: “for post-harvest use on bananas only. 2004 EPA List 4 inerts only” until there is a NOSB decision on the review and approval of inert ingredients allowed for use in organic production and handling.

This petition and recommendation remind us that the area of post-harvest handling, including storage, is not clearly articulated in the NOP Rules. On the National List, Section 205.601 refers to crop production and Section 205.605 refers to processing, and post-harvest handling falls into both areas, for example certification agents have allowed synthetic and nonsynthetic materials from both lists to be used to control pests in storage, processing and warehouse facilities. WDA encourages the NOP to provide guidance to the organic community regarding post-harvest handling and the use of materials.

**Citrus hystrix leaves and fruit** – WDA supports the allowance of non-organic citrus hystrix, (commonly known as kieffer lime, kaffir lime, makrut lime), in products labeled as “organic” if citrus hystrix is not commercially available in organic form.

**Curry leaves (*Murraya koenigii*)** – WDA supports the recommendation to add curry leaves to §205.606- Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic.”

Thank you.

Sincerely,

Bill Wolf, Katherine DiMatteo and Sandy Mays  
Partners

The partners and associates of Wolf, DiMatteo + Associates have over 100 years of combined experience in the organic sector. We have served hundreds of farms and businesses with their organic production systems and regulatory compliance, both nationally and internationally. We have been involved in the founding of several key organic organizations including the Organic Trade Association, Organic Materials Review Institute and the Organic Center. We are fiercely committed to continual improvement and to provide our clients and the organic sector with the tools to advance organic, environmental, and social practices.