



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 Sunset 2013 recommendations: Agar-agar; calcium sulfate; cellulose; carrageenan; glucono delta-lactone

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:

Agar-agar – WDA supports the recommendation to relist agar-agar as nonsynthetic on 205.605(a) and also to add agar-agar on 205.605(b) as an allowed synthetic. The Technical Review provided additional information on agar-agar that indicate that chemical changes may occur to this natural-sourced material depending on the methods and materials used to process the seaweed into agar-agar. WDA agrees with the Committee that is appropriate to respond to this information presented in the Technical Review and to include agar-agar as both a synthetic and a nonsynthetic to retain its use in products labeled “organic” and “made with organic (ingredients)”. WDA also agrees that the listing of this material should be revisited when a final guidance document on the Classification of Material is completed.

Calcium sulfate – WDA supports the Committee’s recommendation to relist “calcium sulfate – mined” as an allowed nonsynthetic on 205.605(a).

Cellulose – WDA supports the Committee’s recommendation to relist “cellulose – for use in regenerative casings, as an anti-caking agent (non-chlorine bleached) and filtering aid” as an allowed synthetic on 205.605(b).

Glucono delta-lactone – WDA supports the Committee’s recommendation to relist “glucono delta-lactone – production by oxidation of D-glucose with bromine water is prohibited” as an allowed nonsynthetic on 205.605(a).

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