



CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy



May 3, 2012

Ms. Ann Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW.
Room 2646-So., Ag Stop 0268
Washington, DC 20250-0268

RE: NOSB Materials Committee Agenda item Proposed Discussion Document on Extractants and Solvents and Proposed Discussion Document on Significant Residues and Classification of Materials

Dear Ms. Arsenault and members of the NOSB:

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the Proposed Discussion Document on Extractants and Solvents, and the Proposed Discussion Document on Significant Residues and Classification of Materials (PDF).

Certifiers and Material Review Organizations (MROs) must regularly make determinations on organic inputs and ingredients that may have been extracted, treated with solvents, or have residues. Rather than address all the individual questions posed in the discussion paper, we want to make one broader point that pertains to both discussion papers. Specifically, any policy made must be achievable by certifiers and MROs.

It is not feasible for the NOSB to review every single synthetic substance that comes into contact with an input or ingredient in an organic product. This type of review would use such significant resources that the work of the NOSB and NOP would be slowed considerably. We believe that the recommendation passed by the NOSB on the classification of materials should be sufficient for the NOP to make a clear guideline on the issues brought up in the discussion document.

The NOP has previously issued guidance through the question and answer format on their website that addressed the volatile synthetic solvent clause of the rule in §205.270. Since these questions have been taken down and are no longer publicly available, we urge you to provide current guidance on this issue. Once the NOP Classification of Materials policy comes out, this issue and the Significant Residues discussion can come back to the NOSB if necessary.

CCOF Comments on NOSB Materials Committee Agenda item Proposed Discussion Document on
Extractants and Solvents and Proposed Discussion Document on Significant Residues and Classification
of Materials
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Again, CCOF thanks you for the opportunity to provide our comments, and sincerely thanks the
Materials Committee for their time and efforts on these complex subjects. We are available to answer
any questions you might have about our comments.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, Chief Certification Officer

*CCOF is a nonprofit organization founded in 1973. It is one of the oldest and largest organic certification agencies in
North America. CCOF serves as a trade association for more than 2,300 certified organic producers and 300
supporting members, in 33 states and three countries.*