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Fairly Traded Gourmet
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National Organic Standards Board
USDA-AMS—TMP-NOP
Washington, DC

Comments to NOSB AMS-NOP-12-0017-0001

Equal Exchange is one of the largest fair trade coffee companies in the United States. We choose to decaffeinate much of our coffee with the liquid Carbon Dioxide method due to the quality that this process yields. We have done so for well over a decade.

Boiling points are generally evaluated at atmospheric pressure at sea level, and carbon dioxide is a gas at that pressure. However, supercritical (and subcritical) CO₂ is not used and does not exist at that pressure. Special cases like supercritical CO₂ need to be evaluated as such, and should not be part of an overall policy decision.

We believe that supercritical CO₂ is *not* a volatile synthetic solvent. First of all, according to the materials policy, supercritical CO₂ is the same substance as carbon dioxide because the phase change between gaseous CO₂ and supercritical CO₂ is not a chemical change. Second, it is not “volatile” because it is naturally a gas and does not exist as a supercritical fluid at normal pressures and temperatures.

With appreciation for your consideration,

Keith Olcott

Organic Certification Coordinator

