

This democratic and transparent process allows stakeholders in the organic community to be empowered to thoughtfully and thoroughly discuss issues in a transparent manner. Open discussion may not be the most efficient way to run the organic program, but transparency and the allowance for public discussion is the only way to maintain the trust and the obtain acceptance of the organic community.

Sanitizers and the 100% claim

In answer to the committee's questions:

Yes, the 100% organic claim does hold value for me, because I understand the product has been grown and processed without synthetics and consists of 100% certified organic ingredients. I do believe that the contact with a non-organic processing aid should effect whether or not there can be an organic claim. For example, in meat processing, an operation can choose to use steam or very hot water as mitigation against pathogens on the carcass or use lactic acid. The operation that has the infrastructure and management skills to avoid the use of the synthetic (even if it is an approved synthetic) should have the opportunity to differentiate themselves in the marketplace. An apple juice maker who uses organic rice hulls as a clarification processing aid, should also be able to differentiate themselves in the marketplace from someone who runs their organic apple juice through nonorganic rice hulls for clarification.

Yes, I do believe that food that has been in contact with a synthetic sanitizer loses its 100% organic status. Many operations rinse off sanitizers with potable water, or run a flush of organic product through a recently sanitized line, before allowing contact with an organic product. In the poultry industry, it is common practice to soak chicken in a high concentration chlorine solution to kill pathogens. This chlorinated water is soaked up into the chicken, and the amount of added "moisture" must be listed on the label. In organic production, only pure water or ice may be used to chill the chicken before packaging. I am concerned that allowance of contact with sanitizers in a 100% organically labeled product, could eventually lead to a similar scenario with chlorinated water in poultry, or salad greens.

A food contact sanitizer is meant to specifically kill pathogens or bacteria present on tables or equipment that directly touch food. Processing aids are a variety of substances that may or may not have some residual amounts in the finished product, that perform a specific function, such as clarifying apple juice. As an organic inspector, I don't think it has been that difficult to determine the difference between a processing aid and a food contact substance. However, all products, including packaging are reviewed to determine compliance with the organic regulations before certification is granted. I do have a small organic dehydration facility for herbs on my farm, which is state licensed as well. We use organic vinegar for washing down the food contact surfaces. We do not use any processing aids.

The vast majority of products in the marketplace are labeled as organic, not 100% organic. This organic label is widely accepted by the organic consumer. I do not see any reason to weaken the 100% organic label with the allowance of contact with synthetic sanitizers. Those producers who have gone the extra mile to avoid the use of synthetic sanitizers, should be rewarded for their effort with the elite label of 100% organic.

GMO letter to the Secretary

I strongly support the direction of the GMO letter to the Secretary Vilsack. As spokespersons for the organic industry within the USDA, the NOSB should use its regulatory function to keep the Secretary informed of issues of concern to the organic community. I am aware that our Secretary and Deputy Secretary are sympathetic to organics and want to see us thrive, however, GMOs are a great threat both to