



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: NOSB CACC – Discussion Document on Use of Sanitizers on Eligibility for 100% Organic Claims

Dear Members of the National Organic Standards Board,

Wolf, DiMatteo + Associates (WDA) appreciates the opportunity to comment on this discussion document. WDA is of the opinion that sanitizers used on raw agricultural commodities during pre- and post-harvest activities should not impact the 100% organic label claim. Any guidance issued on this topic should focus on the use of “processing aids” used on “processed” products as defined by FDA and USDA. Alternatively stated, sanitizers used in direct contact with an otherwise 100% organic raw agricultural product should not prevent the product from qualifying for the 100% organic label.

WDA recognizes the extensive work done by the Committee to draft its discussion document. However, WDA is not submitting answer to the questions posed in the discussion documents at this time. Instead we direct the NOSB to the Organic Trade Association’s comments and answers which WDA fully supports. 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.

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*We deliver the strategic expertise to help organic, socially, and environmentally responsible products and projects reach their full potential—and flourish.*

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