



STATE OF WASHINGTON

DEPARTMENT OF AGRICULTURE

P.O. Box 42560 • Olympia, Washington 98504-2560 • (360) 902-1800

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Ms. Ann Michelle Arsenault, Special Assistant
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. S.W.
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268.

Document Number: AMS-NOP-12-0017; NOP-12-06

RE: NOSB Certification, Accreditation & Compliance Committee Discussion Document
Proposal - Use of Sanitizers on Eligibility for 100% Organic Claims

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) regarding the Certification, Accreditation & Compliance Committee (CACC) Discussion Document Proposal - Use of Sanitizers on Eligibility for 100% Organic Claims. WSDA is the largest state government accredited certifying agent in terms of number of clients and acreage certified.

WSDA has considered the 100% claim to only pertain to processed products; the 100% descriptor is not applied to WSDA certified crops. WSDA approves the use of the 100% descriptor only in those situations where organic products are processed without direct contact with a nonorganic processing aid or food contact sanitizer. Furthermore, WSDA only includes the 100% descriptor on organic certificates if the operation is specifically marketing or labeling the certified product with a "100% organic" claim. Out of the approximately 1,100 certified operations, 37 processors utilize the 100% organic claim in product marketing and labeling. A majority of these clients process single ingredient products such as roasted coffee.

In an effort to inform WSDA's comments, we surveyed a sample of our processor clients that utilize the 100% claim, excerpting several of the questions posed in the CACC Document Proposal. Note that we added a final question seeking feedback on the general impact to our clients' business if the 100% label is taken away entirely. WSDA did not find responses to be conclusive in any one direction on the various queries presented. We feel that these varied responses point to the need for both greater clarification from NOP as well as the need for greater consumer education regarding organic label classifications. Following is the feedback we received from this sample.

- **Does the 100% organic label hold value for you?**
 - 54% stated that it does hold value
 - 31% felt that it does not add value
 - 15% were undecided

- **Do you feel that contact with a non-organic processing aid or a non-organic food contact sanitizer should prevent an item from being 100% organic and why?**
 - 85% felt that contact should prevent an item from being 100% organic
 - 15% felt that should not
 - Comments included
 - “Anything nonorganic would minimize the organic integrity”
 - “If it's beneficial for processor to use it that would be good but consumers have the right to know what is in the product since they're paying a higher price”
 - “Because of food safety issues, (processing aids/non-organic food contact sanitizers) should be allowed as long as they're rinsed off”

- **Should there be a category/list of NOP allowed food contact sanitizers and non-organic processing aids that are approved to be used in the 100% organic category?**
 - 9% felt that there should be
 - 23% felt that there shouldn't be
 - 8% were undecided

- **Do you have customer requests/demands for products in the 100% organic category?**
 - 62% do not have customers requesting this
 - 38% do have customers requesting this

- **How would your business be impacted if the 100% organic label went away?**
 - Most respondents stated that there would be little impact to their business
 - Some respondents stated that there would be negative marketing impact
 - Some respondents stated that there would be a financial impact of changing labels if the 100% label were removed.
 - Comments included:
 - “Consumers are not aware of the differing categories”
 - “It's a valuable resource to those people who make the effort to be 100%; they should be rewarded for their efforts by having access to 100% organic claim”
 - “We would lose a marketing edge. We haven't used the 100% organic label but it s important in that it offers a verbal marketing advantage”
 - “If it was strictly the organic 95% label, it would take away competitive advantage and have a big negative impact. If you want to take away a category, take away the made with organic ingredients label”

WSDA looks forward to continued discussion on this topic and welcomes NOP and NOSB contact if we can be of any assistance.

Sincerely,



Brenda Book
Program Manager