

Compliance, Accreditation and Certification Committee

Use of Sanitizers on Eligibility for 100% Organic Claims

We support the Organic Trade Association (OTA) in their comments on sanitizers in 100% organic claims. Sanitizers used in milk houses and processing facilities should not affect the 100% organic status of the organic product. We would like to point out that by allowing sanitizers to impact 100% organic product status, it also impacts the organic content claim of that product, and therefore, when it becomes an ingredient, impacts the ability of a further processor to determine the amount of organic content going into a final organic product.

Criteria for Material Review by Material Review Organizations

We appreciate and support the efforts to standardize skills and requirements for material review for Accredited Certifying Agencies and Material Review Organizations, particularly CACC urging of the NOP to expedite the publication of clear guidance for synthetic vs. non-synthetic and agricultural vs. non-agricultural determinations. We believe the lack of guidance in these areas has caused a great deal of ambiguity in the organic community. We overall support the comments submitted by the Organic Trade Association on this recommendation. We thank OMRI, CACC, OTA, and WSDA for the great strides taken to align our community on this very important issue.