



National Organic Standards Board
USDA–AMS–NOP
1400 Independence Ave., SW.,
Room 2646-So., Ag Stop 0268
Washington, DC 20250–0268

Submitted via www.regulations.gov

March 19, 2013

RE: Docket AMS-NOP-12-0070

**NOSB Compliance, Accreditation and Certification Subcommittee Proposal on
Calculating Percentage of Organic Ingredients in Multi-ingredient Products.**

MOSA Summary statement:

MOSA supports the CAC Subcommittee Proposal on Calculating Percentages. We appreciate the clarity this proposal brings to our work.

Dear NOSB members:

Thank you for the opportunity to provide comments on the proposal regarding Calculating Percentage of Organic Ingredients in Multi-ingredient Products. MOSA fully supports this proposal.

The regulatory change to replace calculations based on “finished product” with calculations based on “all ingredients” alleviates confusion caused by the misleading language in the regulation, and brings the language into line with standard practice. This change is long overdue.

We support the concept of the NOP website providing a sample template for a self-calculating form. Such a form could be instructive and it also would bring consistency to calculations, and show potential need for product reformulations to achieve desired percentages, before such final formulations are presented for certifier review. This can save time in the certification process.

WEBSITE: www.mosaorganic.org

ADDRESS: P.O. Box 821, 122 West Jefferson Street, Viroqua, WI 54665

EMAIL: mosa@mosaorganic.org **PHONE:** 608.637.2526 **FAX:** 608.637.7032

We appreciate the clarifications on sodium chloride exclusion, and the need to include other materials such as potassium chloride and other National List items in the calculation.

We agree that detailed NOP guidance is needed regarding water exclusion from the calculation. While the NOP has discussed percentage calculations in some training materials, these have not adequately considered some of the finer points of calculations as brought forth in this CAC Subcommittee proposal. We look forward to more detailed NOP training on calculation issues.

We also appreciate the clarifications on label claims compared to actual organic content, comparative measures for processed single ingredients, raw agricultural ingredients, and processed multi-ingredients. The principles described are a nice balance of sound attention to reliable calculations and verification, and sensible assumptions.

Thanks for your work on this issue.

Respectfully submitted,

The MOSA Certification Team