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**AMS-NOP-12-0070**

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USDA-AMS-NOP  
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CROPP Cooperative respectfully submits the following comments pertaining to the docket noted above.

CROPP is the nation's largest organic independent and farmer owned cooperative. Organized in 1988, it represents 1,814 farmers in 35 states and three Canadian provinces, and achieved \$860 million in 2012 sales. Focused on its founding mission of saving family farms through organic farming, Organic Valley produces a variety of organic foods, including organic milk, soy, cheese, butter, spreads, creams, eggs, produce and juice, which are sold in supermarkets, natural foods stores and food cooperatives nationwide. With its regional model, milk is produced, bottled and distributed right in the region where it is farmed to ensure fewer miles from farm to table and to support our local economies. The same farmers who produce for Organic Valley also produce a full range of delicious organic meat under the Organic Prairie label.

**Proposal – Auxiliary/”Other” Ingredients:**

We commend the Handling Subcommittee for their work on this proposal. We support the NOSB review of “other ingredients” in substances petitioned for addition to the National List; we thought that was a part of the process all along. Many of the substances on 605 have annotations reflecting the review of “other ingredients”. We agree that a comprehensive review does not require “other ingredients” to be individually listed. We look forward to seeing the special questions published in the fall meeting materials. We fully support the Organic Trade Association’s in depth comments on this complex topic.

**Proposal – Calculating Percent of Organic Ingredients in Multi-Ingredient Products:**

Thank you for acknowledging the stakeholder comments in your current proposal. We agree with the proposed language changes to 205.302. We look forward to the continued work of the NOP to help provide consistency among all certifiers and handlers to determine how much water should be excluded from some multi-ingredient formulations. We also support listing the organic content of a multi-ingredient ingredient on the specification sheet if possible. There should be a clear path for communicating the actual organic content because that information is reviewed during the certification process. We are receiving requests from our ingredient customers for organic content declarations from our certifier even though we have that information in our file in the form of a product formulation sheet for our certifier. Consistency in this area would be very helpful. We urge NOSB to pass this recommendation and we urge NOP to expedite issuance of guidance.



**Proposal – Oxytetracycline Petition:**

We support eliminating the use of antibiotics for fire blight control for apples and pears. The organic community was very pleased to see the USDA put grant money towards organic practices. OREI provided nearly \$500,000.00 to Oregon State University for the Blossom Project. Let the process continue and allow the experts the opportunity to come up with a viable alternative. Do not run the risk of losing organic production due to a premature sunset. This is a case of “the perfect being the enemy of the good”. Do not mistake this comment for being in favor of antibiotic use in organic production systems, it is not. This comment is out of respect for the fact that the USDA is providing grant money to help with developing better organic production systems. Please don’t circumvent the process.

Thank you for the opportunity to comment on the agenda items for the upcoming National Organic Standards Board meeting.

Sincerely,

Beth Unger

Certification Manager

CROPP Cooperative/Organic Valley/Organic Prairie