



P.O. Box 11558, Eugene, Oregon 97440-3758 USA
541.343.7600 • fax 541.343.8971
info@omri.org

**Comments of the Organic Materials Review Institute
Spring 2013 National Organic Standards Board Meeting
Portland, Oregon April 9-11**

Attention: Materials Subcommittee

The Organic Materials Review Institute (OMRI) thanks the National Organic Standards Board (NOSB) for the opportunity to comment on items in this meeting's agenda [Docket No. AMS–NOP-12-0070]. OMRI is an independent non-profit institute that provides professional, independent and transparent review of materials and processes to determine their suitability for producing, processing, and handling organic food and fiber. OMRI was started in 1997 by a partnership of certifiers, the industry, and organizations that have an interest in organic farming. We are commenting on the following recommendations and/or discussion documents: Limited Scope TR and Production Aids.

Limited Scope TRs

While OMRI concurs with the intent of this document to allow for limited or reduced scope technical reviews (TRs), we believe a recommendation is unnecessary at this time. As one of the contractors that may bid on upcoming TR orders from the NOP, our contract already details the fact that TRs can be limited in scope. Thus, this recommendation deviates from existing contracts. We suggest that the NOP and NOSB work to ensure that the Policy and Procedures Manual is consistent with current NOP procedures.

Further, the categories in Evaluation Question #1 only address crop production materials. The Handling Subcommittee may have other questions for limited scope evaluations.

OMRI recommends that this proposal be withdrawn until a more comprehensive proposal can be crafted including a variety of subjects pertaining to petitions and TRs.

Production Aids Discussion Document

OMRI would like to contribute to the discussion by giving our published definition of various production aids as reviewed to crop and livestock standards:

In general, OMRI considers production aids to be substances rather than devices. Thus, we limit the scope of review for production aids to be those that are generally meant to be applied directly to or come into contact (both directly and indirectly) with organic crops, soil, animals, and food.

Excerpted from the 2010 OMRI Policy and Standards Manual®

Crop management tools and production aids (CT) include inputs that do not provide a recognized plant nutrient, soil conditioning, or crop protection function. This group includes adjuvants, equipment cleaners, insect traps, compost inoculants, and plant extracts without nutrient or pest control claims. Many of these products are nonsynthetic and are therefore not included on the National List. In cases where their use is not specifically addressed in the NOP Rule, the provisions of NOP Rule §205.105 apply a general allowance of nonsynthetic substances, except for those produced by excluded methods or with ionizing radiation or sewage sludge.

Livestock management tools and production aids (LT) are materials used in livestock production that have neither a nutritional nor a direct health care function. Production aids include equipment and facility cleaners, grooming aids, and other materials used on animals and in their living areas. Synthetic substances used as livestock management tools must appear in NOP Rule §205.603 of the National List to be allowed. Nonsynthetic substances are allowed unless specifically prohibited by NOP Rule §205.604. Use of management tools and production aids must meet the management and production practice standards of NOP Rule §§205.105(a) and 205.200.

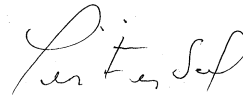
Below is a link to a list of all current OMRI crop and livestock categories that may qualify as management tools and production aids, depending on the ingredients' or products' intended use. These are published in the *OMRI Generic Materials List*[®] and accessible to the public.

[http://www.omri.org/generic-materials?page=1&tid_2\[0\]=699&tid_2\[1\]=703&tid=](http://www.omri.org/generic-materials?page=1&tid_2[0]=699&tid_2[1]=703&tid=)

Thank you for the opportunity to comment on these proposals.



Peggy Miars
Executive Director/CEO



Lindsay Fernandez-Salvador
Program Director