



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 Handling Subcommittee Proposal on Auxiliary/ “Other Ingredients”

MOSA Summary statement:

MOSA supports the Handling Subcommittee Proposal entitled Auxiliary/ “Other Ingredients.” We find the proposal to be clear, enforceable, sound and sensible.

Dear NOSB members:

Thank you for the opportunity to provide comments on the proposal regarding auxiliary/ “other ingredients.” We support the proposal and find that it is consistent with principles used by MOSA in reviewing ingredients and other section 205.605 and section 205.606 inputs, as listed in many handlers’ Organic System Plans. We appreciate the sensible procedures as described in this proposal. Our comments echo those put forth by the Accredited Certifiers Association.

The proposal’s definition of other ingredients is helpful in framing the discussion. It is noteworthy that the term “other ingredients” is not included in the National Organic Standards. We believe any instruction or final NOP guidance should include a similar, clear definition.

We support the baseline criteria in the Proposal, including applicability of the “other ingredients” concept also to materials on the National List at section 205.606.

The Policy and Procedure described in the document is sound and sensible. To date, we have generally considered “other ingredients” in petitioned materials to be under NOSB purview, and so we’ve not prohibited materials based on the presence of “other ingredients,” unless these were contrary to a clear National List-based restriction. In making this assumption, however, we’ve been aware that the NOSB attention to “other

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

ingredients” was not always apparent. We appreciate the transparency and sound attention to auxiliary ingredients that the proposed policy and procedure will add to the material review process. We also appreciate the clarification that other ingredients in general product categories currently on .605 and .606 will continue to be allowed until their next sunset review.

With regard to other considerations in the proposal, we support the concept of transition time for operators to bring products into compliance, if new policy is adopted. We also support moving non-food substances to their own designated section of the National List, for added clarity.

Thanks for your work on this proposal. It’s nice to have the clarity on this issue.

Respectfully submitted,

The MOSA Certification Team