



CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy



March 19, 2013

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

Docket: AMS-NOP-12-0070; NOP-12-17

RE: NOSB Handling Subcommittee Agenda proposal on Auxiliary/ "Other Ingredients"

Dear Ms. Arsenault and NOSB,

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on Auxiliary/ "Other Ingredients." We appreciate that you integrated the comments on the fall 2012 discussion document into this proposal.

This proposal appears to balance consumer expectations for organic products with the paperwork burden of re-reviewing all materials. It also supports CCOF's *Practices Not Paperwork* initiative and the *Sound and Sensible* philosophy of the NOP by avoiding some of the more onerous suggestions in the fall 2012 discussion document. CCOF supports the decision to include "other ingredients" in the review of new petitioned and sun setting materials and record the decisions of the board about "other ingredients" in the review documentation rather than in the National List. Adding questions to the review checklist will give valuable information to certifiers as they review materials for use by organic operations.

It is appropriate that the baseline criteria are based on already existing information. It was unclear to CCOF if the intention is for certifiers and MROs to also use these criteria when reviewing materials for use in organic production. In general the document focuses on the NOSB review. Is the material review process for certifiers and MROs intended to mimic that of the NOSB?

Regarding your other considerations, CCOF would like clarity on the suggested separate list of sanitizers, cleaners, disinfectants, and non-food substances. While having all such substances grouped together rather than appearing on separate crop, livestock, and handler substance lists makes sense, CCOF wants to ensure only materials that might actually be applied to organic products or surfaces that then directly contact organic products (and therefore pose a risk to organic integrity) be listed. Many cleaners, sanitizers, and disinfectants are not intended for use on food or packaging and do not need to be evaluated for compliance, as by definition they pose no risk to organic integrity and should not be required to be listed on the regulation.

Again, CCOF thanks you for the opportunity to provide our comments, and the Handling Subcommittee for their time and effort on these complex subjects. We are available to answer any questions you might have about our comments.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, Chief Certification Officer

CCOF is a nonprofit organization founded in 1973. It is one of the oldest and largest organic certification agencies in North America. CCOF serves as a trade association for more than 2,600 certified organic producers and 300 supporting members in 38 states and 3 countries.