

beets). The sugar beet industry's own evidence demonstrates that transgenic contamination is likely to occur, leaving growers, sellers, and consumers of other, non-GE beets at significant risk of contamination. The NOSB must protect organic consumers from sugar beet fiber contaminated with genetically engineered genes.

Sugar beet fiber is not essential—alternatives exist

Sugar beet fiber is not "essential for the handling of organically produced agricultural products."⁶² While it is used to increase the soluble fiber in foods, it is not essential to the production of any food.

The Technical Evaluation Report lists several alternatives to sugar beet fiber. First, there are other sources of organic vegetable fiber. In many situations other fibers—oat bran, rice bran, barley fiber, wheat bran, citrus pulp, and psyllium—could be used as substitutes for the sugar beet fiber needed. There are also several "functional and commercially available fiber sources that already appear on 7 CFR 205.605, including alginates, gellan gum, and low-methoxy pectin."⁶³ "Fructooligosaccharides (FOS), gum Arabic, guar gum, oligo-fructose enriched inulin and high methoxy pectin currently appear on 7 CFR 205.606."⁶⁴

The basic tenets of organic production require organic production systems to integrate "cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity."⁶⁵ Non-organic sugar beet production systems promote just the opposite, and cannot be part of an organic farming and handling system. We urge you to reject the petition to allow conventionally grown sugar beet fiber because its system of production goes against the principles of organic and it is not an essential food ingredient.

Other Ingredients

CFS believes that the Handling Subcommittee proposal on other ingredients does not comply with the criteria laid out in OFPA. The 'baseline criteria' proposed in the recommendation are not as strict as the requirements of OFPA. "Other ingredients" should be reviewed in the same manner that all ingredients are for organic production, based on the review criteria for human health impacts, environmental harm, essentiality, and compatibility with organic. There is no special provision under OFPA to allow for a secondary, less stringent review process for any ingredients entering products labeled organic. Contents of organic food must either be organic or included on the National List for that purpose.

⁶² 7 C.F.R. § 205.600(b)(6).

⁶³ TER at 10.

⁶⁴ TER at 10.

⁶⁵ 7 C.F.R. § 205.2.