



Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-So, Ag Stop 0268
Washington, DC 20250-0268

March 18, 2013

Docket: AMS-NOP-12-0070

RE: Handling Subcommittee Proposal– Other Ingredients

Dear Ms. Arsenault:

The Hain Celestial Group is one of the largest producers of organic products in the world. We make a wide variety of organic products that are manufactured at many different food processing facilities located throughout the United States and other countries. **In our manufacturing processes we use many of the ingredients that are listed in 205.605 and 205.606.**

We thank you for this opportunity to provide comment on the Proposal on Other Ingredients. **Overall we support the work of the Handling Subcommittee on this topic.** The approach of reviewing other ingredients during the petition process and during the sunset review period is sound and practical. **It is unnecessary, decidedly unpleasant and totally impractical to require a petition for every incidental additive that may be in a national list substance.** The committee proposal provides for a rigorous review and it is transparent, but it could use some minor changes, such as language that spells out the importance of public input on these other ingredients. On this issue and other issues, **we support the comments submitted by the Organic Trade Association.**

We have a few specific comments on the NOSB proposal:

- We support baseline criteria based on the requirements of OFPA and the organic regulations codified in 7 CFR § 205.

The comments below refer to page 6 of the proposal under the heading “NOSB Review.”

- Number 5 describes special questions to “assess the role, essentiality and viability of alternatives to the ‘other ingredients’ in a substance.” Before the Board makes

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any decisions regarding the role or essentiality of other ingredients or any viable alternatives, **we strongly request that during the review process the Board should get input from stakeholders and especially ingredient manufacturers.** Only the ingredient suppliers have the in-depth knowledge of their own manufacturing processes to do this assessment.

- Number 7 concerns the possible stipulation that agricultural “other ingredients” be organically produced. We strongly urge the Board to NOT require that these incidental additives be organic. With our lower volumes, one of our greatest challenges is sourcing ingredients that meet the criteria of the national list. Most of these substances are only manufactured by large companies that sell primarily to conventional food companies. Because our order quantities are relatively small, it is challenging to get an ingredient that meets the national list criteria, such as non-GMO, no irradiation, no sewage sludge, and additional requirements described in the annotations. The “other ingredients” which are necessary for the production of a substance do need to comply with the basic criteria, and all of these ingredients are generally recognized as safe by the FDA. However, if other ingredients are required to be organic, many suppliers will not add inventories of organic ingredients that are used in such small quantities, and they will not create entirely separate products for the comparatively tiny organic trade. While we understand and support the desire to promote the use of organic ingredients, the ingredient suppliers will not do it, and we will not be able to source the ingredients that we need.

We understand that this is a work in progress, and some adjustments will be made going forward. We want to thank the Board members for all of their hard work and for considering our comments.

Sincerely,



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