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March 19, 2013

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

Re: AMS-NOP-12-0070

Dear Ms. Arsenault:

Pennsylvania Certified Organic (PCO) welcomes the opportunity to provide comments to the National Organic Standards Board (NOSB) regarding the **Handling Subcommittee's** proposal on **Auxiliary / "Other Ingredients"**. PCO is a NOP-accredited certifying agent that certifies more than 700 operations, including around 165 crops operations, 385 livestock operations, 120 processor/handler operations and various combinations of these categories.

PCO strongly supports the subcommittee's proposal on auxiliary / "other ingredients," and we encourage the Board to adopt this proposal.

The definition of "other ingredients" provided by the subcommittee in the background section of this proposal is thorough and accurate. PCO encourages the subcommittee to include this definition in its final recommendation, and advises the NOP to adopt the definition and publish it in the NOP Program Handbook and eventually at §205.2 (terms defined) in the organic regulations.

PCO supports the subcommittee's intent for the NOSB to review "other ingredients" found in substances petitioned for the National List and in substances currently on the National List as they come up for sunset review. PCO will be happy to provide input on additional "other ingredients" in a sunset material prior to commissioning the technical review for that material.

PCO agrees that "other ingredients" should not be individually listed on the National List, and instead, the NOSB should document its review of "other ingredients" in the final recommendation. PCO encourages the Board to convey the allowances, restrictions or

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prohibitions of “other ingredients” through annotations. This way, the criteria for “other ingredients” is clear within the regulations, and certifiers will not need to go back to each NOSB recommendation to look for information on how to review “other ingredients” in a substance on the National List. If not in the annotation, PCO would also support this information being published in the forthcoming Permitted Substance List or in the NOP Program Handbook.

PCO suggests that restrictions on “other ingredients” be made for categories or functional classes of “other ingredients,” rather than specific individual “other ingredients,” when possible. For example, the annotations for flavors at §205.605(b) and for colors at §205.606(d) restrict groups of materials without calling out specific components. This allows flexibility for a certifier that is reviewing a brand name material that contains an “other ingredient” that was not specifically addressed by the NOSB.

Lastly, PCO strongly supports the subcommittee’s recommendation to move cleaners, sanitizers, disinfectants and other non-food substances to their own designated section of the National List and develop policy specific to these types of items. These non-food substances do not make up any part of the composition of the organic food product, and in the case of several of these materials, do not ever come in contact with food. It would be logical to review these materials according to baseline criteria that are relevant to their use.

PCO appreciates the opportunity to provide comments and thanks the NOSB members for their careful consideration.

Sincerely,



Johanna Mirenda
Policy Director