



March 19, 2013

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Special Assistant
National Organic Standards Board
USDA-AMS-NOP
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Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Members of the National Organic Standards Board:

I am writing on behalf of Food & Water Watch, a national nonprofit consumer advocacy organization. Our members and supporters are very concerned about the integrity of the organic standards and the credibility of the organic label. We appreciate the opportunity to comment on several of the topics being considered by the Board at your next meeting (Docket # AMS-NOP-12-0070-0001).

We are offering comments on the following issues:

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Inerts Working Group Update

Food & Water Watch appreciates the work of the Inerts Working Group and the Crops Subcommittee to create a procedure for evaluating so-called “inert” ingredients with the criteria required by the Organic Foods Production Act. There has been much discussion of the need to address the issue of inerts, as well as the fact that these substances are not actually physically, chemically, or toxicologically inert. We urge the Board to begin the process of reviewing inert substances as soon as possible.

Public Communications

Food & Water Watch believes there should be more communication between the public and the members of the Board and supports the proposed Policy for Public Communication Between NOSB Meetings. Transparency is a core value of the organic system, and facilitating communication between the public and Board members at all stages of the process is an important step in making sure transparency is achieved. A year-round public communication mechanism sponsored by the Board will allow the public to participate in the process between meetings and to provide information that could be useful to Board members as they navigate complex and often technical issues.