



CCOF

Advancing organic agriculture through certification, education, advocacy, and promotion.

Ms. Michelle Arsenault
Advisory Committee Specialist
National Organic Standards Board, USDA-AMS-NOP
1400 Independence Ave. SW., Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-18-0071-0001

Re: Handling Subcommittee Proposal: Pullulan – petitioned

April 4, 2019

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Handling Subcommittee’s proposal “Pullulan – petitioned.”

CCOF is a nonprofit organization governed by the people who grow and make our food. Founded in California more than 40 years ago, today our roots span the breadth of North America. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

Ten CCOF members list pullulan on their Organic System Plans. Pullulan is used to encapsulate vegetarian dietary supplements. CCOF supports the addition of pullulan to the National List of Allowed and Prohibited Substances at § 205.605(a) as a nonagricultural, nonsynthetic substance. NOSB should add an annotation restricting the use of pullulan to dietary supplement products labeled “made with organic.”

Thank you for your review of our comments. Please do not hesitate to contact me for further information.

Sincerely,

A handwritten signature in black ink that reads "Peter Nell".

Peter Nell
Government Affairs Manager

cc: Kelly Damewood, CEO
Jody Biergiel Colclough, Interim Chief Certification Officer, CCOF Certification Services, LLC