



# CCOF

Organic Certification

Education & Outreach

Political Advocacy

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-15-0085; NOP-15-16  
Re: Handling Subcommittee: Ancillary Substances

April 13, 2016

Ms. Michelle Arsenault and NOSB:

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the Handling Subcommittee's proposal on reviewing ancillary materials.

CCOF (California Certified Organic Farmers) is a nonprofit organization founded in 1973 that advances organic agriculture for a healthy world through organic certification, education, advocacy, and promotion. CCOF is based in Santa Cruz, California, and represents more than 3,000 certified organic members in 42 states and three countries.

CCOF commends the Handling Subcommittee for moving forward on the rules for assessing ancillary substances. Organic manufacturers and accredited certification agencies (ACAs) require clear guidance on these substances. Ancillary substances are minor additives to other minor ingredients. The organic sector is not yet large enough to generate adequate demand for minor ingredients free of ancillary substances.

Organic standards and certification processes must strike a balance between the outcomes we want to achieve and the complexity of certification requirements. Insisting on documentation for smaller and smaller portions of formulations increases costs and time spent on organic recordkeeping. Heavy documentation can negatively impact small and mid-sized organic operations with limited staff to devote to organic compliance requirements.

The Handling Subcommittee's clear guidelines effectively balance these pressures and provide an acceptable way forward.

The proposed definition of "ancillary substance" is useful. In section 2, the first two criteria for assessing compliance are clear and easily enforceable. However, criteria 3-5 may be problematic if there is no clearly referenced, central listing of all FDA-approved GRAS materials, direct food additives, incidental additives, and food contact substances. This could lead to the rule not being applied evenly by all ACAs. Providing additional examples of common known or probably carcinogenic ancillary ingredients would be helpful because it would allow ACAs to list those materials on the review forms as outlined in section 4.



CCOF supports the proposed procedure for NOSB review of ancillaries.

Thank you for providing information that ACAs could include on an ancillary-substances-compliance template. CCOF proposes that material manufacturers self-attest that the ancillary materials they are using meet the requirements of criteria 3-5 and the restriction on known or probable carcinogens.

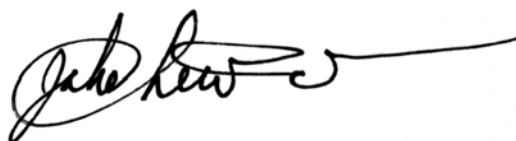
CCOF supports the effort to provide a consistent way to review ancillary ingredients; however we expect material manufacturers to take ownership of the information they provide to ACAs because they are the experts in what is and is not allowed by FDA. Certification agencies can use discretion to investigate any material if they question the information provided.

Thank you for taking the time to review our information. Please contact us for further information or clarifications.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC

