



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: Sunset 2018 Handling Materials

April 13, 2016

Ms. Michelle Arsenault and NOSB:

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on handling materials that are being reviewed for removal from the National List in 2018.

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 supports relisting materials upon consideration of the following:

- clear alternatives with demonstrated viability for organic operations have not emerged since the original listing
- the material remains in use by organic producers
- substantively new information has not been brought forward to demonstrate that the material is incompatible with organic principals

CCOF supports a stable and consistent environment for organic producers. CCOF strongly urges our members to submit comments on their own behalf; however, it is an ongoing challenge for organic producers to keep track of sunset materials and to submit public comment. The webinar platform is a good addition to the commenting process.

In addition to substantive individual and organizational comments, CCOF also encourages the NOSB to carefully review the number of operations that include the material in question on their organic system plan (OSP). In our comments, CCOF lists the number of certified members with the material in question on their OSPs. Inclusion of a material on an OSP does not mean regular use of the material by an operation. However, each listing indicates an individual operation who may rely on or need the option to use the material under certain circumstances.



Handling Substances Listed on 7 CFR 205.605 (a)

Agar-agar:

CCOF has no comment on agar-agar as none of CCOF's members include it on their Organic System Plan.

Animal Enzymes:

Five CCOF members utilize animal enzymes, all cheesemakers. CCOF supports their continued listing because there are no viable alternatives to these enzymes and the reasons stated above.

Calcium Sulfate—Mined:

Eight CCOF members use calcium sulfate—mined, six breweries and two tofu companies.

Carrageenan:

Nine CCOF members include carrageenan on their Organic System Plan, one as a frozen soy product stabilizer, the others in beer production, personal care products, and in edible gel capsules used to package dietary supplements. It is unclear to CCOF whether alternatives exist to these uses for carrageenan.

Glucono Delta-lactone:

CCOF has no comment on glucono delta-lactone. CCOF does not have members who list this material on their Organic System Plan.

Tartaric Acid:

Forty-two CCOF members include tartaric acid on their Organic System Plan. Winemakers, conventional and organic, find this to be an essential input in order to retain grape juice acidity after harvest to prevent spoilage, especially in warmer environments. It is also used by one sweetener manufacturer.

Handling Substances Listed on 7 CFR 205.605 (b)

Cellulose:

Seventeen CCOF members include cellulose on their Organic System Plan. It is used as a filtering agent for organic fruit juice. Wineries, salami and sausage makers, and dairy processors also use this material.

In response to question 4, CCOF does not think that adding the word “powdered” to the annotation makes sense for sausage casings, in which the cellulose is used to retain the shape. Most technical data sheets that we have reviewed describe the material as powdered, fiber, or pulp.

For question 5, CCOF has information on which ancillary substances are used with cellulose in organic handling and processing. Resin, glycerine, propylene glycol, mineral oil, dextrose, and enzymes are used with cellulose as ancillary substances. Resin, glycerine, and propylene glycol are associated with casing materials for sausage and cured meats. Dextrose and enzymes are used in cheese anticaking materials. These ancillary substances are used in the manners described in the Technical Evaluation Report. Additionally, CCOF has reviewed several multi-ingredient materials that include cellulose in formulation with diatomaceous earth, bentonite, and/or casein.



Potassium Hydroxide:

Twenty-two CCOF members include potassium hydroxide on their Organic System Plan. It is used in fruit wax, personal care products, and by fruit and vegetable processors.

Silicon Dioxide:

Twelve CCOF members include silicon dioxide on their Organic System Plan for a variety of uses. It is used in personal care products, supplements, and processed foods. It is used to facilitate a protein turbidity binding process in organic beer making and must be filtered out of the product before final processing. It is also used to meter seed during the seed-pelleting process.

Handling Substances Listed on 7 CFR 205.606

Beta-carotene Extract Color:

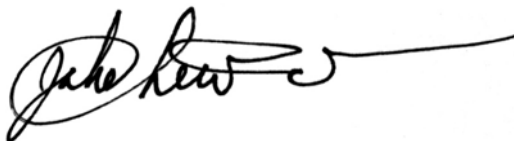
Nine CCOF members include colors on their Organic System Plan. Colors are used in organic juices, beverages, condiments, and candy. Colors are an important tool for organic processed food producers to create products that meet consumer expectations. In turn, the success of organic processed foods in the marketplace leads to greater organic crop acreage to meet demand for more organic raw materials to fulfill manufacturing needs. For organic products to compete successfully with conventional, organic processors need access to the full range of OFPA-compliant food colors. There does not seem to be an organic alternative for beta-carotene extract color at this time.

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

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC

