



# 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-16-0049

Re: Handling Subcommittee: Sunset 2018 Materials

October 25, 2016

Dear Ms. Arsenault and NOSB members,

CCOF (California Certified Organic Farmers) 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 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.

It is important to maintain a stable regulatory environment to support organic producers. Therefore, CCOF generally supports relisting materials based on the following criteria:

- Organic alternatives to the listed material have not been identified since the original listing.
- Organic producers use the material, as evidenced by listing the material in their Organic System Plan (OSP).
- The material is compatible with organic principles.

CCOF encourages the NOSB to consider the number of operations that include the material on their OSP. Although a producer does not routinely use every material on an OSP, many operations include materials that they consistently use or materials that they only use under certain circumstances.

#### **Handling Substances Listed on 7 CFR 205.605 (a)**

*Agar-agar:*

One CCOF-certified dessert maker uses agar-agar.

*Animal Enzymes:*

Five CCOF-certified cheesemakers use animal enzymes. CCOF supports their continued listing because no viable alternatives exist. Note that the ancillary ingredient table is cut off in the anti-caking and anti-stick agent row, making text illegible. Additionally, it is unclear if the carriers and fillers list is complete as it ends in a comma.

*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. It is used as a frozen soy product stabilizer, in beer production and personal care products, and in edible gel capsules used to package dietary supplements.

*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 find this to be an essential input to retain grape juice acidity after harvest to prevent spoilage, especially in warmer environments. It is also used by sweetener manufacturers.

**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.

*Potassium Hydroxide:*

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

*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:*

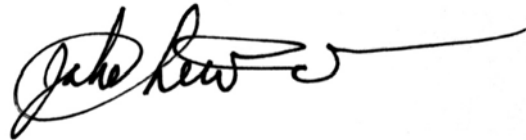
Nine CCOF members include colors on their Organic System Plan. Colors are used in organic juices, beverages, condiments, and candy. There does not seem to be an organic alternative for beta-carotene extract color at this time.

Thank you for considering our input. Please contact us if you would like further information or clarifications.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC