



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: sodium and potassium lactate proposal

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 to classify sodium lactate and potassium lactate as synthetic and to place them on the National List.

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 the classification of sodium lactate and potassium lactate as synthetic, as well as the listing of these materials on §205.605 (b) with the annotation "for use as an antimicrobial agent and pH regulator only."

In comments to the NOSB dated October 7, 2015, CCOF supported the proposal to add sodium lactate and potassium lactate to the National List at §205.605 (b) for use as an antimicrobial agent only. Since then, NOSB has gathered additional information. NOSB makes a convincing case for listing these two materials as pH regulators, as well as antimicrobial agents. Therefore, CCOF supports the classification of sodium lactate and potassium lactate as synthetic and supports the listing of these materials on §205.605 (b) with the annotation "for use as an antimicrobial agent and pH regulator only."

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

Sincerely,

Handwritten signature of Cathy Calfo.

Cathy Calfo, Executive Director/CEO

Handwritten signature of Jake Lewin.

Jake Lewin, President, CCOF Certification Services LLC