



CCOF

Organic Certification

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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-17-0057-0001

Re: Handling Subcommittee: Reclassification of Magnesium Chloride Proposal

April 4, 2018

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Handling Subcommittee's proposal "Reclassification of magnesium chloride."

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.

CCOF is unsure whether the reclassification of magnesium chloride from a nonagricultural synthetic substance to a nonagricultural non-synthetic substance will impact our members. The current documentation available for these materials is not sufficient to prove that the materials are non-synthetic by the end of the production process. Currently, 5 CCOF members list magnesium chloride on their Organic System Plan (OSP). Each of the materials used by our members is supported by documents that demonstrate that the substance is derived from seawater to meet the current annotation. To evaluate whether the final materials are non-synthetic, certifiers would need to verify complete material production process information from material manufacturers.

The Technical Review indicates that there are nonsynthetic forms of magnesium chloride commercially available. Thus, if the materials previously approved by CCOF are considered synthetic, then producers should be able to find a nonsynthetic material.

Thank you for your careful review of our comments. Please contact me if you would like further information.

Sincerely,

A handwritten signature in black ink that reads 'Kelly Damewood'.

Kelly Damewood
Director of Policy and Government Affairs

cc: Cathy Calfo, Executive Director/CEO
Jake Lewin, President, CCOF Certification Services, LLC