



CCOF

Advancing organic agriculture through certification, education, advocacy, and 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-19-0038-0001

Re: Handling Subcommittee: 2021 Sunset Reviews

October 3, 2019

Dear Ms. Arsenault and NOSB:

Thank you for the opportunity to comment on the 2021 Sunset Review of handling substances on the National List of Allowed and Prohibited Substances.

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.

The NOSB should carefully consider the impacts of removing a substance that has been listed on an Organic System Plan (OSP) because producers need a variety of tools available to them. Handlers use a range of ingredients and processing aids that are specific to the types of products they process and handle. In the attached comments, we include the number of CCOF members who list each substance in their OSP.

Our comments also describe how the substance is used by our members and, when possible, whether viable alternatives exist. This information is based on our experience as a certifier and on feedback from our members. Although we strongly encourage our members to comment, they do not always have the capacity to directly submit their own comments. Our goal is to relay valuable information about our members' materials and practices to help NOSB maintain a clear, consistent regulatory environment for organic producers of all scales and types.

Thank you for your review of our comments. Please do not hesitate to contact me for further information.

Sincerely,



Peter Nell

Government Affairs Manager

cc: Kelly Damewood, CEO, CCOF, Inc.
April Crittenden, Chief Certification Officer, CCOF Certification Services, LLC
Rebekah Weber, Policy Director, CCOF, Inc.

CCOF's Comments on the 2021 Sunset Review Handling Scope Materials

The following comments are based on CCOF's member input, our experience offering organic certification for more than 40 years, and our current certification of over 1,400 organic processors and handlers.

§ 205.605 (a) – Nonsynthetic nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food groups(s))."

Acids – Citric

111 CCOF members list citric acid on their OSP. Citric acid is used for a variety of needs across the organic product spectrum.

Acids – Lactic

21 CCOF members list lactic acid on their OSP. Lactic acid has a variety of uses for meat products, snack products, cheese, and more.

Calcium chloride

24 CCOF members list calcium chloride on their OSP. Calcium chloride is used for cheese making, brewing beer, olive packing, tomato canning, and more.

Dairy cultures

19 CCOF members list dairy cultures on their OSP. Listing microorganisms is sufficient and a separate listing of dairy cultures is unnecessary; therefore, CCOF supports the subcommittee's vote to remove dairy cultures from the National List.

Enzymes

67 CCOF members list enzymes on their OSP. Enzymes are used for a variety of purposes across the organic product spectrum.

L-Malic acid

15 CCOF members list L-Malic acid on their OSP. L-Malic acid is used in the production of wine, juices, dietary supplements, and personal care products. CCOF agrees with the subcommittee's determination that L-Malic acid should be reclassified and moved to § 205.605(b).

Magnesium sulfate

No CCOF member lists magnesium sulfate on their OSP. Magnesium sulfate can be used in the production of tofu. Some tofu producers have successfully used calcium sulfate or magnesium chloride as coagulants.

Microorganisms

73 CCOF members list microorganisms on their OSP. Microorganisms are used in wine, dietary supplements, kombucha, dairy products, and more. The listing of microorganisms as sufficient and agrees that a separate listing of dairy cultures is not necessary.

Perlite

3 CCOF members list perlite on their OSP. Perlite is used as a filtration aid during wine production.

Potassium iodide

No CCOF member lists potassium iodide on their OSP.

Yeast

90 CCOF members list yeast on their OSP. Yeast is critical to producing many organic products such as bread, wine, spirits, and beer. There are still types and forms of yeast that are not commercially available in organic form. Organic yeast suitable for winemaking is particularly challenging for some CCOF members to source.

§ 205.605 (b) – Synthetic nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food groups(s))."

Alginic Acid

No CCOF member lists alginic acid on their OSP.

Activated charcoal

17 CCOF members list activated charcoal on their OSP. Activated charcoal is used for filtration of wine and spirits.

Ascorbic acid

49 CCOF members list ascorbic acid on their OSP. Ascorbic acid is used by beverage manufacturers, wineries, bakeries, dietary supplement manufacturers, and others for a variety of uses.

Calcium citrate

1 CCOF member lists calcium citrate on their OSP. The CCOF member using calcium citrate manufactures dietary supplements.

Ferrous sulfate

No CCOF member lists ferrous sulfate on their OSP.

Hydrogen peroxide

43 CCOF members list hydrogen peroxide on their handling scope OSP. Hydrogen peroxide is a common equipment sanitizer.

Nutrient vitamins and minerals

28 CCOF members list nutrient vitamins and minerals on their OSP. Nutrient vitamins and minerals are used to add nutritional content to a wide variety of products. CCOF encourages NOSB to clarify annotation requirements for nutrient vitamins and minerals and supports Option 2 (proposed annotation 4) from the 2016 Handling Subcommittee discussion document.

Peracetic acid

571 CCOF members list peracetic acid on their OSP. Peracetic acid is used for post-harvest, direct contact handling of products and is also used as an equipment sanitizer.

Potassium citrate

1 CCOF member lists potassium citrate on their OSP. The CCOF member using potassium citrate used it as an acidity regulator during the winemaking process.

Potassium phosphate

No CCOF member lists potassium phosphate on their OSP.

Sodium acid pyrophosphate

5 CCOF members list sodium acid pyrophosphate on their OSP. Sodium acid pyrophosphate is used by bakeries making quick-breads, crackers, and baking mixes as a component of baking powder (with sodium bicarbonate).

Sodium citrate

7 CCOF members list sodium citrate on their OSP. Sodium citrate is used in meat processing and in manufacturing dietary supplements and personal care products.

Tocopherols

24 CCOF members list tocopherols on their OSP. Tocopherols are used as antioxidants in nut products, personal care products, food bars, and more.

§ 205.606 – Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as organic.

Celery powder

6 CCOF members list celery powder on their OSP. Celery powder is used in processed meat products.

Fish oil

No CCOF member lists fish oil on their OSP.

Gelatin

One CCOF member lists gelatin on their OSP. The CCOF member uses gelatin as a fining agent.

Orange pulp, dried

One CCOF member lists dried organic pulp on their OSP. The CCOF member uses dried orange pulp in chilled vegan snack bars.

Seaweed, Pacific kombu

No CCOF member lists Pacific kombu seaweed on their OSP.

Wakame seaweed

No CCOF member lists wakame seaweed on their OSP.