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October 12th, 2010

The National Organic Standards Board
c/o Lisa Ahramjian, Executive Director
1400 Independence Avenue, SW
Room 2646 – So., Ag Stop 0268
Washington D.C. 20250-0268

RE: AMS-NOP-10-0068; NOP-10-08

Nanotechnology Guidance Document

Dear NOSB Materials Committee members:

Oregon Tilth supports the work of the Materials Committee on the topic of Nanotechnology, and the careful and methodical consideration that is being given to a topic that we as industry admittedly don't know enough about. We support the working definition being proposed for acceptance by the NOP along with the following guidelines included in the recommendation:

- " ***Disallow*** the engineered nanomaterial form of substances currently on the National List (NL) since nothing on the NL has been reviewed or a TAP review performed that included any aspect of the manufacture, use and disposal of the listed substances in a nanomaterial form.
- " Accept materials that meet the working definition of engineered nanomaterials ***as synthetic substances***.
- " Accept that engineered nanomaterials may have unique properties that distinguish them from all listings of these substances in a bulk form, and that they are not allowed by a listing of the bulk form of the substance on the NL, pending a further recommendation from the NOSB, and implementation thereof by the NOP, on the use, or prohibition, of engineered nanomaterials in organic production processing and packaging.
- " Work with the NOSB to determine whether enforcement of restrictions in primary packaging and food contact surfaces is possible, practical, and legal.

We also support the scheduling of a symposium on the topic of nanotechnology in order to better inform the future decisions and deliberations of this Board and the National Organic Program.

In closing we would like to recognize that there is widespread public concern over the use of nanotechnology and emphasize that in any possible future consideration of a nanomaterial for the NL, the burden of proof must weigh strongly against the proponents to prove that the material is safe. At this point in time too little is known about the impact of nanoparticles on human health and the environment, therefore we support the precautionary principle as we move ahead in our efforts to learn more about its applications.

Respectfully submitted,

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Oregon Tilth, Inc.

Oregon Tilth, Inc. is a non-profit 501(c)(3) organization that supports and promotes biologically sound and socially equitable agriculture. Oregon Tilth offers educational events throughout the state of Oregon, and provides organic certification services to organic growers, processors, and handlers internationally. An NOP accredited certifier since 2002, Oregon Tilth currently certifies over 650 farms and ranches and over 600 handlers in more than 35 states affording us a broad perspective of current practices and challenges faced by organic producers and handlers. This perspective also extends to the anticipated successes and challenges that this discussion topic will affect upon them.