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April 8, 2011

Patricia Atkins
National Organic Standards Board
National Organic Program,
USDA-AMS-NOP
1400 Independence Ave., SW.,
Room 2646 So., Ag Stop 0268
Washington, DC 20250-0268

Via www.regulations.gov

RE: NOSB Materials Committee Recommendation on **Corn Steep Liquor (CSL)**

Summary;

OTCO supports this recommendation that Corn Steep Liquor has been determined to be non-synthetic. We encourage the Board to recommend that Corn Steep Liquor not appear on the National List and therefore be implicitly allowed as a non-synthetic substance.

Discussion;

OTCO appreciates the significant investment by the NOSB of time and intellect, resulting in the thoroughness of the research that went into this recommendation. We recognize the complexity and potential far-reaching manifestation of this issue so appreciate seeing robust debate while remaining respectful of dissenting positions.

The case for the Majority and the Minority are both thoughtfully and intelligently presented. OTCO has previously, and continues now, to endorse the case that Corn Steep Liquor, and subsequently Corn Starch and Corn Gluten Meal, are non-synthetic, and so aligns with the majority opinion. The manufacture of CSL is not a chemical process. It is a fermentation process, which is controlled with sulfur dioxide in order to prevent fermentation from proceeding too far, resulting in purification.

What concerns us as certifiers is the recurring language regarding Corn Steep Liquor produced "*via the traditional countercurrent corn wet milling process*". We are concerned that if this language is incorporated into a Final Rule that it will require farmers and certifiers to verify that wherever Corn Steep Liquor is used, that it is verified to be produced solely by this method. Since CSL is typically one ingredient in a formulation, verifying the production method of the CSP back through farmers, dealers, manufacturers and brokers to the manufacturer would require significant resources. This potential requirement seems unnecessary if the countercurrent corn wet milling process is indeed the traditional method.

As a solution we recommend that the NOSB determine that corn steep liquor be considered as non-synthetic and therefore not necessary to list on the National List 205.602 with an annotation.

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 the draft guidance will affect upon them.

Oregon Tilth appreciates the opportunity to comment on the draft guidance documents and thanks the NOSB and NOP for carefully considering our comments. As usual we remain at your service in order to discuss or clarify our comments.

Respectfully submitted,

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Oregon Tilth, Inc.