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April 14, 2016

Ms. Michelle Arsenault, Special Assistant
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.,
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

RE: Docket: AMS-NOP-15-0085
Handling Subcommittee – 2018 Sunset Materials,
Proposed Annotation Changes, Petitioned Materials

Dear Ms. Arsenault:

Oregon Tilth thanks the National Organic Standards Board (NOSB) for the opportunity to provide input on the materials up for 2018 sunset review, as well as on proposed annotation changes and the new material petitions being considered. We continue to be impressed with the detail and thoughtfulness of the documents and proposals provided, and the Board's thorough consideration of input from the public on these topics.

2018 Handling Sunset Materials

We appreciate the subcommittee asking detailed questions directed at certifiers and producers regarding the use of these materials. OTCO has notified our handling clients of the impending sunset review of these materials, and have urged them to provide public comment to address the questions posed by the subcommittee about these materials. Per the subcommittee's request, we also provide the following data on the use of these materials by our clients:

- **Agar-agar**: OTCO certifies one operation that is using agar-agar as a thickener in their products.
- **Animal enzymes:** Most certified cheese manufacturers are using animal-derived rennet. OTCO certifies dozens of operations that use animal-derived rennet, microbially-derived rennet, or both. Because of the differences in quality of curd formation, both are used depending on the type or quality of finished product desired. To date, OTCO has only seen microbially-derived lipase and catalase used at certified operations. We have not reviewed any pancreatin, pepsin, or trypsin for use in organic products.
- **Calcium sulfate**: OTCO certifies at least 14 operations that are using calcium sulfate as part of their manufacturing process.
- **Carrageenan:** At least 16 operations certified by OTCO use carrageenan in dairy products, personal care products, processed meat products, pet food, soy products, and in the production of beer as a clarifying agent.

- **Glucono delta-lactone:** OTCO certifies three operations using Glucono delta-lactone manufacturing potato products, soy-based products, and personal care products.
- **Tartaric acid:** OTCO certifies at least 12 operations that use tartaric acid in products such as wine, baked goods, seasonings, beverages, flavors, and dressings/sauces.
- **Cellulose:** At least 14 operations use cellulose.
- **Potassium hydroxide:** At least 16 operations use potassium hydroxide in personal care products or for pH adjustment.
- **Silicon dioxide:** At least 21 operations are using silicon dioxide. One client provided a comment indicating the use of silicon dioxide is essential for beer clarification. Currently OTCO has reviewed many applications for use of silicon dioxide in place of organic rice hulls. Many operations do use organic rice hulls, however some operations require the use of silicon dioxide. The most common reason for a request to use silicon dioxide in place of organic rice hulls is related to form or quality. Operations have provided videos, experimental data, test run documentation, photos, and other resources to justify the use of silicon dioxide in place of organic rice hulls.
- **Beta-carotene extract:** Many non-organic agricultural colors are a mixture of agricultural substances and some contain beta-carotene extract as part of their formulation. Currently OTCO has at least 8 certified operations using a non-organic agricultural color that contains beta-carotene extract or is beta-carotene extract.

Again, we thank the NOSB for their work and continued evaluation of materials.

Respectfully submitted,
Oregon Tilth

Oregon Tilth is a leading certifier, educator and advocate for organic agriculture and products since 1974. Our mission to make our food system and agriculture biologically sound and socially equitable requires us to find practical ways to tackle big challenges. We advance this mission to balance the needs of people and planet through focus on core areas of certification, conservation, public health, policy and the marketplace.