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October 3, 2018

Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. S.W.
Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-18-0029
Crops Subcommittee – Petitioned Materials

Dear Ms. Arsenault,

Oregon Tilth thanks the National Organic Standards Board (NOSB) for the opportunity to provide input on the petition to add sodium citrate to the National List “for use as an anticoagulant in the production of blood meal” under crop fertility inputs. We continue to be impressed with the detail and thoughtfulness in addressing the complex issues raised by each proposal, and the Board’s thorough review of input from the public on these topics.

Sodium Citrate

Oregon Tilth has approved several blood meal products for use by our certified organic producers. Currently, Oregon Tilth has over 90 certified operations using blood meal products and many additional clients using blended fertilizer products, which frequently contain blood meal. Oregon Tilth also allows the use of blood meal in inputs approved by other Material Review Organizations (MROs) such as Organic Materials Review Institute (OMRI), Washington State Department of Agriculture Organic Program, and Pennsylvania Certified Organic. Oregon Tilth currently reviews crop fertility inputs based on the ingredients declared on the label; we do not require disclosure of processing aids used within ingredients not disclosed on the label or ingredient list. Sodium citrate is currently used as a processing aid in blood meal inputs approved in organic production.

The addition of sodium citrate to the National List for use as an anticoagulant implies that blood meals must be evaluated for the presence of this and other anticoagulants or processing aids. This is not the current practice for many MROs and certifiers. In spring 2017, OMRI noted it does not currently review anticoagulants in blood meal, but the addition of sodium citrate to the National List could compel them to change this policy and review other anticoagulants in blood meal. In addition, NOP guidance 5034-1 lists blood meal as nonsynthetic with no annotation regarding the need to review anticoagulants or processing aids. The addition of sodium citrate to the National List could set a precedent that all processing aids used in crop inputs must be either nonsynthetic or on the National List in order for such products to be approved; such a precedent would require a complete overhaul of how the industry evaluates these types of products, requiring an increase in work without much improvement to organic integrity.



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If sodium citrate is added to the National List as proposed, Oregon Tilth will continue its current protocol for the review of processing aids (including anticoagulants) used in crop fertility inputs until the NOSB issues further guidance. Oregon Tilth will allow sodium citrate, if disclosed, as an anticoagulant in blood meal per the proposed annotation, but will not review or otherwise inquire about the presence of other undisclosed anticoagulants or processing aids in crop fertility inputs.

If the NOSB recommends sodium citrate for addition to the National List, Oregon Tilth would like to respectfully ask for clarification regarding the need (or lack thereof) to review anticoagulants and other processing aids used to manufacture crop fertility inputs. Specifically, Oregon Tilth would like the NOSB/USDA NOP to clarify:

1. If certifiers should inquire about the presence of undisclosed processing aids in all crop fertility input ingredients.
2. If any processing aids present in crop inputs, even those that do not have a technical or functional effect in the final product, must be nonsynthetic (and not prohibited at §205.602) or allowed synthetics on the National List.
3. If the addition of sodium citrate to the National List only serves the purpose of clarifying its allowance as an anticoagulant in blood meal used in crop fertility inputs in organic production.

Oregon Tilth supports these efforts to continually refine the National Organic Standards by promoting sound and sensible material review in pursuit of organic integrity.

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, policy and the marketplace.