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September 30, 2020

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-20-0041
Handling Subcommittee – 2022 Sunset Materials**

Dear Ms. Arsenault:

Thank you for the opportunity to comment to the National Organic Standards Board (NOSB) Handling Subcommittee on materials up for 2022 sunset review. We appreciate the NOSB's summary regarding the current allowance, history and concerns related to each of these materials. Oregon Tilth has notified our clients of the impending sunset review of these materials, and urged them to provide public comment to ensure changes meet industry needs.

The following data reflects OTCO-certified clients' current use of materials the Handling subcommittee is unsure about relisting or planning to remove from the National List.

Number of OTCO-certified operations using organic and non-organic forms of 205.606 materials:

- **Carnauba Wax:** Four operations use non-organic carnauba wax, and three use organic.
- **Colors:** There are at least 30 clients using non-organic colors. Use of individual colors is difficult to report, as many colors are blends of two or more allowed colors at 205.606. We can confirm that operations use the following organic ingredients, although they may not be used exclusively as colors:
 - Beet juice
 - Carrot color/powder
 - Elderberry juice, powders and extracts
 - Sweet potato powder
- **Glycerin:** Thirteen operations use non-organic forms, and 34 operations use organic forms. This does not include its use in flavors, which is common.
- **Orange Shellac:** Two operations use non-organic shellac. None use organic shellac.



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Number of OTCO-certified operations use of 205.606 materials (organic form only):

- **Kelp:** Eight
- **Cornstarch:** Seven
- **Sweet Potato Starch:** 16
- **Turkish Bay Leaves:** Three
- **Whey protein concentrate:** 20

Thank you, NOSB members, for your ongoing work to evaluate National List materials. The continued effort to increase organic materials for use strengthens the integrity of products, improves traceability, and grows the sector.

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.