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March 20, 2013

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

Docket: AMS-NOP-12-0070

RE: Handling Subcommittee Proposal Auxiliary/"Other Ingredients"

Dear Ms. Arsenault,

Oregon Tilth supports the proposal for Auxiliary/"Other Ingredients" from the Handling subcommittee. This proposal will allow consistent decisions to be made by Accredited Certifiers regarding "Other Ingredients" that accompany ingredients on §205.605 and §205.606 of the National List. This proposal will help to clarify to non-organic ingredient manufacturers and sales distributors why their ingredients would, or would not qualify to be allowed in Organic and Made with Organic Products.

We support the NOSB Policy and Procedure in general but specifically request that the Handling Subcommittee amend their Proposal and Procedure as follows:

- 1) The NOP should provide separate guidance on auxiliary or "Other Ingredients" via published guidance. The published guidance should address specificities on agricultural and non-agricultural synthetic and non-synthetic additives.
- 2) The proposed NOSB Review Procedure should include public comment as well as what is being disclosed in the petition and Technical Reports. Additionally, sunset ingredients should allow industry input as well as input from ACA's and MRO's. This provides manufacturers the opportunity to disclose the "other ingredients" used in their formulations and why they are imperative to the finished products. It could also provide information as to why specific other ingredients do not need to be included in the formulation of a specific ingredient.

Oregon Tilth agrees with the recommendation and would like to reinforce the following points and

provide comment on other considerations provided in the recommendation:

- A checklist and recommendation coversheet should be required to indicate what other ingredients were reviewed by the NOSB for a petitioned material. However, we do not feel that this is the appropriate tool for industry to use as a reference in determining if a specific auxiliary or “other ingredient” should be allowed in other products. The allowances for “other ingredients” are better suited in the annotation for the listed ingredient. The restriction on other ingredients being placed in the annotation would be consistent in practice to other materials currently listed such as flavors and colors. This would also allow for easier and more accurate information retrieval from suppliers.
- Standardized language from the NOP regarding non-organic ingredient affidavits is crucial. This provides industry wide collaboration for language specific to excluded methods and prohibited practices. However, we do not believe that a specific form should be mandatory. Certifiers and industry should have the ability to clarify and customize the forms as necessary to suit their business needs.
- Transition time for operators to bring products into compliance is a must. An appropriate transition time will allow non-organic ingredient manufacturers time to reformulate, test and manufacture suitable alternatives so that there is minimum disruption in the marketplace. We encourage the NOP to consider what a necessary transition time would be.
- A separate list for cleaners, sanitizers, disinfectants, boiler additives and other non-food substances would add clarity to §205.605 and 205.606.

We thank the NOSB for the effort in writing this proposal as it takes into account the many facets of reviewing other ingredients. We see great benefits for the entire industry in the hard work you have put forth into this proposal.

Respectfully submitted,
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 1,300 farms, ranches and handlers affording us a broad perspective of current practices and challenges faced by organic producers and handlers.