

Recap of public comments submitted to:  
**The National Organic Standards Board**  
April 2013 meeting

Compiled by the staff of The Cornucopia Institute



**C O R N U C O P I A**  
I N S T I T U T E

# Materials Subcommittee

## Limited Scope TRs

**Motion:** To adopt a proposal for a process for limited scope technical reviews

	<b>Support</b>	<b>Oppose</b>
<b>Farmers/Citizens</b>	None	None
<b>Public interest groups</b>	Beyond Pesticides The Cornucopia Institute National Organic Coalition	None
<b>Food Processors/Handlers</b>	None	California Natural Products The Hain Celestial Group
<b>Trade Associations/Industry Consultants</b>	None	Juice Products Association Organic Trade Association Organic Materials Review Organization (OMRI) (Concurs with intent but believes proposal is unnecessary) Wolf DiMatteo and Associates
<b>Certifiers</b>	California Certified Organic Farmers (CCOF) (needs to be part of broader policy change on TRs) Midwest Organic Services Association (MOSA)	None

## Confidential Business Information

Discussion Document (which this is a discussion document, not a proposal, there appears to be a clear divide between support for Possible Recommendation #1 and #2)

	<b>Possible Recommendation #1</b>	<b>Possible Recommendation #2 (allow CBI)</b>
<b>Farmers/Citizens</b>	None	None
<b>Public interest groups</b>	Beyond Pesticides Cornucopia National Organic Coalition	None
<b>Food Processors/Handlers</b>	None	Smucker Natural Foods
<b>Trade Associations/Industry Consultants</b>	None	Juice Products Association Organic Trade Association Wolf DiMatteo and Associates
<b>Certifiers</b>	None	Midwest Organic Services Association (MOSA)

## **Policy Development Subcommittee**

### **Public Communications Proposal**

**Motion:** To adopt a year-round online mechanism for public communication

	<b>Support</b>	<b>Oppose</b>
<b>Farmers/Citizens</b>	None	None
<b>Public interest groups</b>	Beyond Pesticides Center for Food Safety Cornucopia National Organic Coalition Food and Water Watch	None
<b>Food Processors/Handlers</b>	None	None

<b>Trade Associations</b>	None	None
<b>Certifiers</b>	California Certified Organic Farmers (CCOF)	None

## Livestock Subcommittee

### Pet Food Amino Acids

**Motion:** To add synthetic amino acids to the National List §205.603

**Petitioned by:** Pet Food Institute

**Purpose:** nutritional supplement for pets

	<b>Support</b>	<b>Oppose</b>
<b>Farmers/Citizens</b>	None	None
<b>Public interest groups</b>	None	The Cornucopia Institute (oppose all AAs) Beyond Pesticides (oppose all AAs)
<b>Handlers/Manufacturers</b>	Castor and Pollux Pet Works (allow taurine, methionine, lysine, threonine)	None
<b>Trade Associations</b>	Pet Food Institute (allow all AAs) Organic Trade Association(allow all AAs)	None
<b>Certifiers</b>	California Certified Organic Farmers (CCOF) (allow only taurine)	None

# Crops Subcommittee

## Tetracycline

**Motion:** To remove the expiration date of October 21, 2014 for oxytetracycline and replace that with a new expiration date of October 21, 2016.

**Petitioned by:** Washington State Horticultural Association

**Purpose:** Antibiotic to control *Erwinia amylovora* (fire blight) on apples and pears.

	<b>Support</b>	<b>Oppose</b>
<b>Consumers</b>	6	260 (on <a href="http://www.regulations.gov">www.regulations.gov</a> ) Center for Food Safety Petition (24,545 consumers opposed) Organic Consumers Association (24,016 consumers opposed) Food and Water Watch (6,544 consumers opposed)
<b>Farmers</b>	11	2
<b>Packinghouses</b>	Blue Bird (retain in sunset)	None
<b>Public interest groups</b>	National Organic Coalition (extend with restrictions)	Beyond Pesticides Consumers Union Center for Environmental Health Center for Food Safety The Cornucopia Institute Food and Water Watch Johns Hopkins Center for a Livable Future, Bloomberg School of Public Health

		Organic Consumers Association Public Employees for Environmental Responsibility (PEER)
<b>Distributors, Retailers</b>	CF Fresh, Inc. (extend until 2016) Co-op Partners Warehouse (extend until 2016) Charlie's Produce (extend until 2017) UNFI (extend until 2017) Organically Grown Company (extend, centrist) Veritable Vegetable (extend until 2016)	PCC Natural Markets
<b>Food Processors</b>	The Hain Celestial Group (extend until 2017) California Natural Products (extend until 2017) SunOpta Food Solutions and Tradin USA (extend until 2017)	
<b>Trade Associations/Industry Consultants</b>	Juice Products Association (extend until 2016) Northwest Horticultural Council (return to sunset) Organic Trade Association (extend until 2017, not 2016) Organic Tree Fruit Association (extend with restrictions) Organic Produce Wholesalers Coalition (extend until 2016 or 2017) Tilth Producers of Washington (extend until 2016 or 2017) Wolf, DiMatteo + Associates (extend until 2017)	Northeast Organic Dairy Producers Alliance

<b>Certifiers</b>	Accredited Certifiers Association (extend until 2016) California Certified Organic Farmers (extend until 2016, 2017 or 2020) Oregon Tilth Certified Organic (OTCO) (extend until 2016) WSDA Organic Advisory Board (extend until 2016)	
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Notes:

1. Commenters that favored the “centrist” proposal presented by NOC (allow a short extension with a use annotation) are listed as being in support of an extension.
2. Commenters who favored an extension offered varying comments on how long the extension should last, as noted in parentheses.
3. The original petition requested a removal of the expiration date and a return to the sunset process.

**Polyoxin D Zinc Salt**

**Motion:** To add polyoxin D zinc salt to the National List §205.601

**Petitioned by:** Kaken Pharmaceutical Co. Ltd.

**Purpose:** Fungicide

	<b>Support</b>	<b>Oppose</b>
<b>Farmers/Citizens</b>	7 farmers/citizens	182 citizens
<b>Public interest groups</b>	None	Beyond Pesticides Center for Food Safety The Cornucopia Institute National Organic Coalition
<b>Food Processors/Handlers</b>	None	None
<b>Ingredient Suppliers/Materials</b>	Kaken Pharmaceutical Co., Ltd.	None

<b>Manufacturers</b>	(manufacturer), submitted by Conn & Smith, Inc. * (consultants) Certis USA (marketer)	
<b>Trade Associations/Industry Consultants</b>	Frank Sances (Alliance Farm Group, Pacific Ag Group) Gary Cloud, GLC Consulting LLC	None
<b>Researchers</b>	Anthony Keinath, Clemson University James Adaskaveg, University of California - Riverside	None
<b>Certifiers</b>	None	None

\* Conn & Smith, Inc. is a consulting firm for *Pesticide Regulatory Services*

**Indole-3-butyric acid (IBA)**

**Motion:** To add Indole-3-butyric acid (IBA) to the National List §205.601

**Petitioned by:** Hortus USA Corp.

**Purpose:** Plant hormone to stimulate formation of adventitious roots.

	<b>Support</b>	<b>Oppose</b>
<b>Farmers/Citizens</b>	None	170 citizens
<b>Public interest groups</b>	None	Beyond Pesticides The Cornucopia Institute National Organic Coalition
<b>Food Processors/Handlers</b>	None	None
<b>Ingredient Suppliers/Material Manufacturers</b>	Hortus USA	
<b>Trade Associations/Industry Consultants</b>	None	None
<b>Certifiers</b>	None	None



# Handling Subcommittee

## Sulfuric Acid

**Motion:** To add to the National List 205.605

**Petitioned by:** Marinova/ **Purpose:** pH adjuster for fucoidan processing

	<b>Support</b>	<b>Oppose</b>
<b>Farmers/Citizens</b>	None	None
<b>Public interest groups</b>	None	Beyond Pesticides The Cornucopia Institute National Organic Coalition
<b>Food Processors/Handlers</b>	None	Nature's Path
<b>Ingredient Suppliers/Material Manufacturers</b>	Marinova (petitioner)	None
<b>Trade Associations/Industry Consultants</b>	Richard Theuer	None
<b>Retailers</b>	None	PCC Natural Markets
<b>Certifiers</b>	None	None

## Barley Betafiber

**Motion:** To add to the National List 205.606

**Petitioned:** Cargill / **Purpose:** added nutrient/health claim

	<b>Support</b>	<b>Oppose</b>
<b>Farmers/Citizens</b>	None	1,300 public comments oppose conventional ingredients in organic foods
<b>Public interest groups</b>	None	Beyond Pesticides The Cornucopia Institute National Organic Coalition
<b>Food Processors/Handlers</b>	None	Nature's Path

<b>Ingredient Suppliers/Material Manufacturers</b>	Cargill (petitioner – no written comment submitted)	None
<b>Trade Associations/Industry Consultants</b>	None	None
<b>Retailers</b>	None	None
<b>Certifiers</b>	None	None

**Sugar Beet Fiber**

**Motion:** To add to the National List 205.606 as an added nutrient (fiber)

**Petitioned:** Nordic Sugar / **Purpose:** primary purpose: added nutrient/health claim

	<b>Support</b>	<b>Oppose</b>
<b>Farmers/Citizens</b>	None	1,300 public comments oppose conventional ingredients in organic foods
<b>Public interest groups</b>	None	Beyond Pesticides Center for Food Safety The Cornucopia Institute Food and Water Watch National Organic Coalition
<b>Food Processors/Handlers</b>	None	Nature's Path
<b>Ingredient Suppliers/Material Manufacturers</b>	Nordic Sugar (petitioner)	None
<b>Trade Associations/Industry Consultants</b>	None	None
<b>Retailers</b>	None	None
<b>Certifiers</b>	None	None

**DBDMH**

**Motion:** To add to the National List 205.605

**Petitioned:** Albemarle Corporation/ **Purpose:** antimicrobial in slaughterhouses

	<b>Support</b>	<b>Oppose</b>
<b>Farmers/Citizens</b>	None	140 citizen comments specifically reject DBDMH; 1,300 comments reject the use of dangerous chemicals in organic processing
<b>Public interest groups</b>	None	Beyond Pesticides The Cornucopia Institute National Organic Coalition
<b>Food Processors/Handlers</b>	None	Nature's Path Nourish Organic Market and Deli
<b>Ingredient Suppliers/Material Manufacturers</b>	Albemarle Corporation (petitioner)	None
<b>Trade Associations/Industry Consultants</b>	None	None
<b>Retailers</b>	None	None
<b>Certifiers</b>	None	None

**“Auxiliary”/Other Ingredients**

**Motion:** To adopt the Handling Subcommittee’s proposal for auxiliary/other ingredients

	<b>Support</b>	<b>Oppose</b>	<b>Table the proposal</b>
<b>Farmers/Citizens</b>	None	1,300 public comments	None
<b>Public interest groups</b>	None	Beyond Pesticides Center for Food Safety The Cornucopia Institute National Organic Coalition	None
<b>Food Processors/Handlers</b>	Organic Valley/CROPP Stonyfield	Nature's Path	California Natural Products The Hain Celestial Group
<b>Ingredient Suppliers/Material</b>	None	None	None

<b>Manufacturers</b>			
<b>Trade Associations/Industry Consultants</b>	Organic Trade Association (OTA) Organic Materials Review Institute (OMRI) Wolf DiMatteo	None	None
<b>Certifiers</b>	Accredited Certifiers Association (ACA) Midwest Organic Services Association (MOSA) Oregon Tilth (OTCO) Pennsylvania Certified Organic (PCO)	None	None

## Certification, Accreditation and Compliance Subcommittee

### Calculating Organic Percentage

**Motion:** To accept and move forward the proposal on calculating percentage of organic ingredients in multi-ingredient products as amended.

	<b>Support</b>	<b>Oppose</b>
<b>Farmers/Citizens</b>	None	None
<b>Public interest groups</b>	Beyond Pesticides (with concerns) The Cornucopia Institute	None
<b>Food Processors/Handlers</b>	Organic Valley/CROPP Smucker	None
<b>Trade Associations/Consultants</b>	Juice Products Association Organic Trade Association (with	None

	suggested revisions) Wolf DiMatteo and Associates	
<b>Certifiers</b>	Accredited Certifiers Association (ACA) California Certified Organic Farmers (CCOF) Midwest Organic Services Association (MOSA) OneCert Oregon Tilth (OTCO) (with suggested revisions) Pennsylvania Certified Organic (with suggested revisions)	None