



CROPP COOPERATIVE
ORGANIC *and* FARMER-OWNED *since* 1988

May 2, 2012

USDA AMS NOP
AMS-NOP-12-0017
Spring 2012 NOSB Agenda Items
Posted to regulations.gov

CROPP Cooperative respectfully submits the following comments pertaining to the docket noted above.

CROPP is the nation's largest organic independent and farmer owned cooperative. Organized in 1988, it represents 1,687 farmers in 35 states and three Canadian provinces, and achieved \$715 million in 2011 sales. Focused on its founding mission of saving family farms through organic farming, Organic Valley produces a variety of organic foods, including organic milk, soy, cheese, butter, spreads, creams, eggs, produce and juice, which are sold in supermarkets, natural foods stores and food cooperatives nationwide. With its regional model, milk is produced, bottled and distributed right in the region where it is farmed to ensure fewer miles from farm to table and to support our local economies. The same farmers who produce for Organic Valley also produce a full range of delicious organic meat under the Organic Prairie label.

GMO ad-hoc Committee Proposed Letter to Secretary Vilsack:

CROPP has a long history of opposition to the use of GMO's. We have invested heavily in the fight against GMO Round-up Ready Alfalfa and the call for mandatory labeling of all foods and food ingredients produced from GMO's. We appreciate and support the proposed letter to Secretary Vilsack from the GMO ad-hoc Committee. The letter represents a good start to working with the USDA by taking reasonable steps to protect organic farmers. We look forward to additional work done by the committee to assure that the USDA organic seal is the gold standard fulfilling consumer expectations.

Livestock Committee Topics:

Please withdraw the GMO vaccine recommendation from the table. There are many unanswered questions regarding the accuracy of the technical report. The Organic Trade Association wrote a very thorough and well researched comment. We fully support OTA's comment.

The Animal Welfare discussion documents are very extensive. That is a lot of reading to get through in a pretty short time frame. Although it would take more time than was allowed to do thorough review, in general we found the documents to be inconsistent with the two animal welfare recommendations passed by the full board. Additionally the language used in the guidance document had a regulatory tone using language such as "must", "required", "should", and "shall" which can create confusion among certified operations and certifiers.

Handling Committee Sunset 2013 Carrageenan:

In instances where we use additional ingredients with our farmers' products, CROPP Cooperative strives

to use certified organic ingredients whenever possible, and strictly limit the use of approved nonsynthetics or synthetics to meet consumer expectations for the highest quality products. Like other products such as xanthan gum, guar gum, and annatto, carrageenan is an ingredient that we seek to replace with alternative ingredients. We have several products that include carrageenan; ultra-pasteurized whipping cream, flavored milk products, eggnog, and soy beverages. Our ultra-pasteurized whipping cream contains carrageenan as a stabilizer to retard the rate of fat separation over the shelf life of the product. Carrageenan is also used in our chocolate milk to suspend the particles of cocoa. Carrageenan is used in our soy beverages for both suspension and stabilization. Although we are working to reformulate our products to eliminate carrageenan as an ingredient, in certain instances we have not been able to find an adequate certified organic replacement that will meet our consumers' expectations for the quality of the product they have come to rely upon.

We are concerned that the Handling Committee's recommendation to change the listing from 605(a) to 605(b) has the potential of allowing the material to sunset from the list. Previously, the NOSB secured the use of a material while making changes to annotations by a two vote system to assure no disruption to the industry. The Handling Committee's review did not find the material incompatible with organic processing; please do not allow it to sunset at this time.

Thank you for the opportunity to comment on the agenda items for the upcoming National Organic Standards Board meeting.

Sincerely,

Beth Unger
Certification Manager
CROPP Cooperative