



**The Organic Specialists**

May 3, 2012

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So, Ag Stop 0268  
Washington, DC 20250-0268

Docket: AMS-NOP-12-0017

**RE: NOSB Materials Committee - Discussion Documents on Extractants and Solvents and Significant Residues Definition in Classification of Materials Policy**

Dear Members of the National Organic Standards Board,

Thank you for your continued work to clarify and improve the procedures and policies by which the NOSB conducts its business. Wolf, DiMatteo + Associates (WDA) appreciates the opportunity provided through public comment to participate, as a stakeholder, in the unique National Organic Program public/private partnership.

The NOSB and the stakeholder community, including an ad-hoc Materials Working Group, have for over seven years, worked to advance a policy on the Classification of Materials. In 2010 the NOSB approved a Classification of Materials recommendation that is currently under consideration by the NOP. The issues raised in these two Materials Committee discussion documents are linked to the Classification of Materials recommendation therefore WDA believes that further discussion on these issues should be postponed until the NOP releases a draft Classification of Materials policy. It is our opinion that a more productive discussion and response from stakeholders will occur when there is a NOP draft policy on the Classification of Materials. Otherwise this will be another endless round of debate without resolution or action. WDA urges the NOP to release a draft policy on the Classification of Materials as soon as possible so that progress can be made toward consistent review of materials by the NOSB, Materials Review Organizations, and certification agents.

WDA recognizes the extensive work done by the Committee to draft its discussion document. However, WDA is not submitting answer to the questions posed in the discussion documents at this time. Instead we direct the NOSB to the Organic Trade Association's comments and answers which WDA fully supports.

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Sincerely,

Bill Wolf, Katherine DiMatteo and Sandy Mays  
Partners

The partners and associates of Wolf, DiMatteo + Associates have over 100 years of combined experience in the organic sector. We have served hundreds of farms and businesses with their organic production systems and regulatory compliance, both nationally and internationally. We have been involved in the founding of several key organic organizations including the Organic Trade Association, Organic Materials Review Institute and the Organic Center. We are fiercely committed to continual improvement and to provide our clients and the organic sector with the tools to advance organic, environmental, and social practices.