

May 2, 2012

Docket No. AMS-NOP-12-0017; NOP-12-06 Public comments on the Policy Committee recommendations concerning **conflict of interest.** 

The Hain Celestial Group is one of the largest producers of organic products in the world. We make a wide variety of organic products that are manufactured at many different food processing facilities located throughout the United States and other countries.

While we appreciate the efforts of the policy committee to clarify what constitutes a conflict of interest for a Board member, we believe that some of the proposed changes are ambiguous. Defining a conflict of interest as "an actual *or potential* direct financial interest" is vague and overly broad. Who determines what constitutes a potential financial interest? The current definition that does not include the word "potential" should be maintained.

In addition, the proposed change to include direct financial gain of "an immediate family member" is too broad. The financial interests of relatives may have nothing to do with a Board member's finances, and if the Board member does gain financially, that is already covered by the current definition.

We thank the Board members for all of their hard work and for considering our comments.

Sincerely,

Zareb Herman

Regulatory Affairs Director

Azusa, CA Office

Zareb Herman

626-385-0639

zareb.herman@hain-celestial.com

Oray Orlan

Troy Aykan Associate Counsel, Regulatory Affairs Azusa, CA Office 626-385-0613 troy.aykan@hain-celestial.com