

CERTIFICATION, ACCREDITATION AND COMPLIANCE COMMITTEE

100% Organic labeling and sanitizers

EXECUTIVE SUMMARY

Meticulous sanitation should be the hallmark of all production systems (conventional and organic). Within the restrictions of OFPA and the federal organic regulations, the use of sanitizers should not disqualify food products from 100% organic labeling.

Value of the 100% Organic Label

We are not aware of any consumer survey research on the importance of the 100% organic label. It seems to us that consumers are especially interested in the organic label, and that many would not know the difference between “certified organic” and “100% organic.” As far as we know, consumer education about the organic label generally focuses on the importance of the organic label and the USDA Organic seal, and not on the differences between the top two labeling tiers.

Processing aids and sanitizers and 100% organic label

Contact with a non-organic input in a farm field does not disqualify a commodity from being 100% organic. Addition of a non-organic input in the handling facility (as an ingredient) does disqualify an item from being 100% organic. Processing aids such as sanitizers fall in a gray area in between. While some may say that no residues appear in the final food, this assertion should be studied more thoroughly because it does appear that residues of sanitizers may appear in the final product. As an example, certain patients being treated for thyroid cancer, and having to avoid iodine in their diets, are required to forgo dairy products as iodine is a typically used sanitation product on dairy farms.

Another complicating factor is that there appear to be no organic alternatives for sanitizers. The only alternative would therefore be to use no sanitizers at all, and just wash with spring or well water containing no chlorine or other sanitizers (with some associated risk). Even so, that means that a farmer using municipal water with chlorine would be disqualified, while a farmer using similar practices on and off the field but using non-chlorinated well water, would qualify.

It seems to us that the use of processing aids and sanitizers, when used lawfully and within the constraints of the National List, should not disqualify a product from the 100% organic claim.

However, it is important that the use of some of these products be "restricted" and that any such restrictions be enforced by ACAs and the USDA.

It has come to our attention that some produce companies are skirting the restrictions that chlorine levels in wash water not exceed safe water drinking act maximums. By treating fruits and vegetables at much higher levels, and adding additional water prior to discharge, they are practicing "solution by dilution." This is deleterious to the environment and there very well might be other examples in addition to chlorine where abuses are taking place. We don't know if research has been done on residues or any negative human health impacts.

Food Safety

The CACC asked a question about food safety and the use of sanitizers, and we believe that some sanitizers, when carefully reviewed for use in organics, play an important role in ensuring the safety of organic foods.

Conclusion

The proper food safety environment, and meticulous sanitation, should be the hallmarks of all production systems (conventional and organic). Within the restrictions of OFPA and the federal organic regulations, their use should not disqualify food products from 100% organic labeling.