

## Requested Input from NOSB, NOP and Public Comment

The CACC proposes to put forward the following questions to the NOSB and the organic community regarding the use of food contact or food contact surface sanitizers and the resultant ability to use labeling claims of "100% Organic":

1. Does the 100% Organic label claim hold value for you?

Yes. We make a number of products in which every one of the ingredients is organically produced, in conformance with the clear, unambiguous language in the NOP regulations, in particular 205.301. We have found no language in the regulations to exclude these products from the "100% Organic" category. Yet these products, which had been certified in previous years as "100% Organic," are now being downgraded into the "Organic" category, despite the fact that neither the product formulations nor NOP regulations have changed in the interim. We find the "confusion" about the "100% Organic" category--and the subsequent "moving of the goalposts"--deeply troubling, not to mention expensive.

All single-ingredient products which are "organically produced" should automatically fall into the "100% Organic" category. If there is any other ingredient included, the product would, by definition, be a multi-ingredient product. If such an inclusion is "organically produced," the product should still fall into the "100% Organic" category.

We observe that the NOP regulations in no way suggest, in the calculation of the percentages of "organically produced" ingredients in a product, that any of these ingredients are required to, individually, be certified to a "100% Organic" standard. In other words, a multi-ingredient product, with all of its individual ingredients "organically produced," which is to say "Organic," should qualify for certification in the "100% Organic" category.

2. Do you feel that contact with a non-organic processing aid should prevent an item from being 100% organic and why?

If an allowed non-organic processing aid is present in a statistically significant quantity, the item would not qualify for the 100% organic category. If the non-organic processing aid is not present in the final item, the item should qualify for the 100% organic category.

7. Should there be a category/list of NOP allowed food contact sanitizers and non-organic processing aids that are approved to be used in the 100% organic category? (e.g. Chlorine, peracetic acid, diatomaceous earth, etc.)

We feel that this would be reasonable if such items are reviewed by the NOSB according to the same standards as items currently included on the National List. This list of materials should apply to all NOP labelling categories equally.

8. At what concentration, if any, do you consider a sanitizer/disinfectant to have disqualified an item from the 100% organic category?

A disinfectant at any percentage should disqualify a multi-ingredient product from inclusion in the 100% Organic category.

9. Should food contact sanitizers be allowed in the 100% organic category if it is proven that no residue from the treatment remains in the finished good?

If it can be proven that the quantity is zero, by an independent third-party, then yes.

10. Do you certify items to the 100% organic category? If so, how many?

We have a number of products that have been certified to the 100% organic category.

11. Do you feel that food contact sanitizers are necessary for food safety concerns?

Of course.

12. If food contact sanitizers could be used while still allowing for a 100% organic claim would you certify more products with the organic claim? If not, why not?

No. We do not use non-compliant contact materials.

13. Do you have customer requests/demand for products in the 100% organic category?

Yes. We also have many requests for the consistent application of the term "Organic" across all product categories--in particular, within the personal care product category--for all manufacturers.