

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

March 18, 2013

Docket: AMS-NOP-12-0070

RE: Handling Subcommittee Proposal – Other Ingredients

Dear Ms. Arsenault:

Thank you for this opportunity to comment on the Handling Subcommittee Proposal– Other Ingredients.

The transparent review of agriculture and foods that the Organic sector represents, and the improvement of the environment and food supply that result from this focused attention are a couple of the reasons that many of us work so hard to advance Organic foods.

Looking at the “Other Ingredients” in this way furthers our oversight. This is progress.

However, exactly HOW we go about this can further the development, hinder, or even eliminate large categories of processed Organic foods; eliminating the choice for consumers, the jobs for Americans, and the subsequent demand for Organically farmed agriculture.

This proposal appears to have been written without understanding the impact this impossibly complicated proposal would have on processed organic foods.

Please set this proposal aside for now, and spend some time conferring with people with experience in making processed Organic foods. I, for example, have been involved with organic processed foods in various ways since the early 90s (actually before but I had no idea what I was doing then) when I started speaking with certifiers about what was actually going on, and if you are not aware, am in my third (and last) year as Chair of OMRI, have been Chair of the State of California’s Organic Product Advisory Committee more than once, and have written scads of articles on organics especially as OFPA and the NOP regulations went into effect. I am considered by many to be an expert in processed foods so I bring this to the table as well.

Ms. Arsenault, thank you, the NOP, and all the Board members for your consideration of these comments and for your continuing work to further Organic Agriculture and Organic Foods.

Sincerely,

John K. Ashby

General Manager – Ingredients
California Natural Products