

National Organic Standards Board
PUBLIC COMMENT WEBINAR

Summary of public comments

April, 19th 2016

Presenter & Affiliation	Topic of Presentation	Summary of Comments
Nicole Dehne Vermont Organic Farmers	Hydroponics, lidocaine, parasiticides, etc.	Hydroponics – no soil diminishes value of organic. Biodegradable mulch – 100% bio-based is unrealistic; there are no mulches that meet the requirement to be made of 100% bio-based. Lidocaine and procaine – supports reducing withholding times.
Dr. Roger Clemens Regulatory Science Program University of Southern California	Carrageenan	No evidence that this poses a health risk as a food additive. Necessary for organic production. Q: About his support of organic food A: no evidence that it adds nutrition; more concerned about feeding the world. In response to questioning: Noted that research showing carrageenan is harmful is suspect.
Grace Gershuny GAIA Services	General	Supported comments from OTA about ancillary substances, excluded methods, and nutrients vitamins and minerals. Also commented on biodegradable mulch – referenced one farm that declined to be certified because they wanted to use it.
Patricia Di Gasbarro Manufacturer	No show	
Paul DeGrandpre Organic Handler PowderPure Company Dalles, OR	Silicon dioxide	95% of their fruit and veg powders require anti-caking properties of silicon dioxide. The removal would prevent supplying fruit and vegetable powders in organic.
Dr. Joanne Tobacman Department of Medicine University of Illinois at Chicago	Carrageenan	Carrageenan causes inflammation and is used in experiments for that purpose. Inflammation contributes significantly to human disease. This inflammation is caused in all humans and old world apes due to the alphasgal epitope, not just sensitive individuals. Low-molecular weight and immunogenic bond to humans – stimulates an immune response. Q: from Tom Chapman: does it really effect all human cells? A: Based on studies, the inflammation is based on the same pathway that makes humans reject organs from other animals. Q: from Harold Austin: replication of her findings? Another lab first demonstrated carrageenan’s relation to the TLR4 pathway and so her work has been replicated– many industry funded studies are deeply flawed.
Madison Monty	Hydroponics,	Hydroponics – soil is the foundation of organic

Northeast Organic Farming Association of Vermont (NOFA-VT)	peracetic acid, seed purity, excluded methods	farming. Excluded methods – support the updated definitions. Seed purity – supports the data collection, etc. with seed purity. Peracetic acid – supports the relisting for all uses. Important alternative to chlorine for organic fruit and vegetable growers.
West Mathison apple and pear grower WA	Speaking in support of product	Benefits of using the product “Smart Fresh;” they use in their conventional growing. Applied inside, short shelf-life. Product improves pack-out; fruit has less decay (relates to reception of ethylene) and reduces shrink for apples and pears. Improves freshness and flavor. Also prevents “storage scald”. Comment from Harold: Smart Fresh is currently petitioned for discussion in Fall meeting.
Margaret Scoles International Organic Inspectors Association (IOIA)	CS 2018 Sunset; LS Proposals - Parasiticides, Lidocaine and procaine, Hypochlorous acid; MS Seed purity	Excluded methods – very supportive. Seed purity – supports task force; current organic seed requirement is not strong enough. Add to work agenda – eliminating incentive to convert native ecosystems. Supports reducing withholding times of lidocaine, etc. for animal welfare. Parasiticides – changing the withholding times is supported. Wool that has been treated with a parasiticides should not be okay for organic certification; should not become “routine.” Copper sulfate – support relisting Calcium fluoride - support
Angela Wartes citizen, farmer, textile expert	Parasiticides	Supports proposal in its entirety. Allowing the use of parasiticides would allow wool to be supplied more widely. This would transform the US organic wool market.
Tyler Smith Consumer Reports Food Safety and Sustainability Center	HS Hypochlorous acid, SDBS, Sodium lactate and potassium lactate	Strongly opposes the re-listing of carrageenan – it is harmful to human health. The technical review regarding carrageenan did not go into all of the health risks.
Marie Burcham Cornucopia Institute	PDS Proposal - PPM updates/revisions	The rewrite should be tabled. There are specific issues with conflict of interest, time for public comment, ambiguity and inconsistencies, and not following the dictate of FACA. Question about whether FACA requires the NOP to “approve” NOSB agendas. Answer that yes, NOP should approve these documents, but that does not mean they get to create the NOSB’s work agendas.
Kelly Damewood California Certified Organic Farmers (CCOF)	GMO issues	Strong support for work on GMOs that the NOSB is doing. Organic producers need clear guidance to avoid inadvertent contamination.
Helen Kees President, Cornucopia Institute and farmer	PPM revisions/general comments	The NOSB’s own PPM should be developed from public comment and from the NOSB themselves as the history has been.
Kristen Walker	No show	

citizen		
Amber Pool organic certification specialist for CCOF	Sunset copper sulfate	228 members have copper sulfate on their organic system plan (OSP); critical for aquatic rice producers. Growers don't need it every year, but some years it is essential. No evidence of copper accumulation.
Christine Rich	No show	
Amber King Chef	General comments/ Carrageenan	There are unwanted ingredients in organics – cellulose, carrageenan, etc. Carrageenan – regardless of what the studies say, many people are having bad reactions to this substance. Cellulose – we want a non-GM product in its place. Specifically corn products (GM corn is a problem). Chlorine products and artificial dyes and colors – do not benefit the end consumer! Even if there is no alternative, the consumers don't want them. Synthetic DHA, synthetic vitamins and minerals – all should be taken out of organic. Only wild or natural fish products. CRISPR should not be used in organics.
Peter Pitts Center for Medicine in the Public Interest	Carrageenan	Supports relisting of carrageenan. Asked about the difference of carrageenan and poligeenan. Did not know answer.
Kelly Taveras Organic Trade Association	General	General comments about OTA members.
Ryan Howard Chicago Vegan Foods	Carrageenan	Carrageenan is in a lot of foods that are vegan (like vegan cheese, etc.); product quality suffers when carrageenan isn't used. The people that don't want it are anti-science, anti-vaccine, climate change deniers. He wants to make natural vegan analog products, already makes vegan marshmallows and wants to make organic vegan marshmallows (using carrageenan). Q: from Zea: he notes he is ok with gellan gum and xanthan gum, but carrageenan is a better replacement for gelatin.
Dr. Myra Weiner TOXpertise, LLC	Carrageenan	Support the continued listing of carrageenan. Response to flaws in the infant formula study: pigs are an excellent proven model for human models and epitope theory has no substance. Q: from Zea: validity of in-vitro techniques or water introduction and the comment about other animals being not comparable in these studies? A: Carrageenan is a very large molecule. These issues are not relevant to food use. In-vitro cells – carrageenan is not available to interact with the cells because of how it reacts to the medium.
Shakeel Rehman Fairlife, LLC	Carrageenan	Supports the relisting of carrageenan because of essentiality. Readily available from sustainable sources.

Esteban Macias organic growing technical advisor	Greenhouse growing	Greenhouse organic growers (mostly tomatoes), turn coconut hull into living soil. Container growing has advantages, including water reclamation.
William Matakas Jr. FMC Health and Nutrition Asia Pacific (formerly president of Marinalg, the carrageenan industry lobby group)	Carrageenan	Speaking to the essentiality of carrageenan. Q: from Tom Chapman: can the seaweed and carrageenan be classified as organic? A: Waiting to have conversations regarding organic aquaculture. Carrageenan should be on the label if it appears in the final product.
Megan Parker	No show	
Zen Honeycutt Moms Across America	Chemical contamination	Against the relisting of carrageenan. Contamination of organics with glyphosate is very harmful. Neighboring farms that contaminate organic farms should be held responsible. There should be no “tolerance level” for these chemicals. Manure from conventional farms should not be allowed on organic.
Colehour Bondera former NOSB member and farmer	PDS Proposal - PPM updates/ revisions	NOSB is a public advisory board – NOSB is pushing for passing through the PPM changes without full consideration of public input. The NOP decided to change the PPM and changed how the PDS functioned. Take the PPM back to the PDS for review and get rid of this rewrite. Each change should be individually voted on by the NOSB. Q: from Tom Chapman: Clarification, what the NOSB writes needs to be reviewed? A: Yes the NOP needs to approve the PPM — after being created by the NOSB itself.
Katherine DiMatteo Wolf, DiMatteo + Associates	General comments/sunset	Support the disallowance of NPEs, but wants sufficient time to get the formulations. Request that biodegradable mulch films be reviewed for use. Regarding sodium nitrate: there should be a new rule.
Steve Etko Policy Director National Organic Coalition (NOC)	Sunset review workload Copper sulfate	The workload has become unbalanced – supports changes to Sunset review. It will also make the public comment easier. Option B is the most useful according to NOC. Copper sulfate harms to beneficial organisms, not consistent with a systems approach. It’s important that USDA have research funding. Cellulose needs to be further researched.
Erik Gundersen Midwest Organic Services Association (MOSA)	Annotation change to vitamins and minerals	Accredited Certifiers Association (ACAs) perspective on these issues.
Debra Clement Gourmet Garden	Sodium lactate	Important ingredient in food processing. For herbs and spices the flavors and aromas are unstable and normal food processing destroys them (like heat). Sodium lactate should be allowed on the list.
Farley Baricuatro – Seaweed sourcing manager	Carrageenan	Discussion of seaweed farming – an attractive economic activity for low-income people.

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