

Neal, Arthur

From: allone@drbronner.com%inter2 [allone@drbronner.com] on behalf of allone@drbronner.com
Sent: Tuesday, August 16, 2005 8:21 PM
To: National List
Subject: NOP Sunset Review, Docket # TM-04-07
Attachments: ATTACHMENT.TXT

August 16, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW Room 4008
So. Ag. Stop 0268
Washington, DC 20250
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Sent via E-mail and Fax

Re: NOP Sunset Review, Docket # TM-04-07

Dear Director Neal:

I am writing on behalf of our brand of organic gluten-free nutrition bars, Alpsnacks, in which we use Tocopherols to prevent oxidation and rancidity of the oils in the nuts. Tocopherols can be obtained without the use of synthetic solvents and is improperly classified as a synthetic in the National List, given it is extracted from soy oil.

We also affirm other commenters' support for the reclassification of other similarly situated substances, that are produced from vegetable or mineral sources but are improperly classified as "synthetic".

We also affirm comments that call for the cessation of special allowance of conventional substances that are now being made and marketed to NOP certified organic standards, such as guar gum, gum acacia, locust bean gum, yeast and any others similarly situated.

For the record, while we do produce certified soaps and body care products that are currently at issue with the NOP in addition to our organic food products, the alkali needed to saponify the oils in our soaps is of an amount that renders our soaps into O70 products and so is not at issue here. The xanthan gum we currently use in our O95 lotions will be replaced shortly with certified organic guar gum and organic gum acacia (xanthan gum is another instance of an improperly classified "synthetic" in that it is produced by microbial fermentation of glucose, and the glucose could and should one day be organic). I want to clarify that our comments above are not tied to any needs or issues regarding organic personal care products, but rather to the often small and hidden but essential role minor processing aids play in producing organic ingredients generally, whether for food, pet food, supplements or personal care products, such as adjusting pH, nitrogen blanketing to prevent oxidation, etc.

8/19/2005

Many producers of organic ingredients/products produced with substances from the national list may be able to adjust and maintain their O95 status with workable alternatives, but many others likely will not to the detriment of both organic farmers and consumers. Our understanding is that tofu is one of many examples of a product that is in needless jeopardy of losing its organic status without relevant processing aids maintaining their current status under the NOP. I do not pretend to know all the issues involved in processing various organic ingredients and products, and I am sure there are many instances where workable processing alternatives do exist to substances on the national list. But there are many where there are not, and in general, in generating the National List, a rigorous and thorough NOSB evaluation was involved, that excluded a great many proposed substances to maintain the integrity and spirit of the National Organic Program. There are improper classifications as noted above, but in general, as I read through the National List, I can see why allowance of most the substances in question makes sense to process organic ingredients: they were allowed under strict NOSB review and were found fit to expanding the organic markets and scope for organic agriculture and farming.

Aside from removing conventional substances that are being produced organically, and recategorization of substances improperly listed as “synthetic”, we generally support the National List in its present form.

Sincerely,

David Bronner
President
Dr. Bronner’s Magic Soaps