

**HYNITE  
CORPORATION**

# Public Comment

**To:** National Organic Standards Board  
**From:** Bruce Krantz, VP & Gen. Mgr., Hynite Corp.  
**Date:** October 25, 1999  
**Re:** **HYDROLYZED LEATHER MEAL**

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Hynite Corporation has been supplying organic growers with hydrolyzed leather meal since 1919. It is the only manufacturer of leather meal (a/k/a leather tankage) in the United States. Leather meal is also manufactured in Italy where it is classified as an organic fertilizer by Italian law and considered the most important organic source of nitrogen.

Before the first NOP proposed rule was developed, Hynite provided a wealth of independent scientific information about leather meal to the USDA-NOSB and the Technical Advisory Panel. Somehow this information was not transferred to the black data binders that boardmembers used as their primary reference. Most of the statements pertaining to leather meal found in the data binders were not supported by scientific fact or references. They were opinions! In good faith Hynite relied on the NOSB to distinguish scientifically supported comments from opinions, then rule accordingly on the use of hydrolyzed leather meal. The NOSB failed to make the distinction.

After the first NOP proposed rule was released for public comment, Hynite properly petitioned the USDA-NOP to reverse its position on prohibiting the use of leather meal in organic food production. Again Hynite provided independent scientific information specific to the use of leather meal as an organic fertilizer. The petition and associated references were submitted, in good faith, eighteen months ago and have yet to be recognized or posted on the internet website with all the other public comments. Hynite believes the information offered must be considered before the second version of the proposed rule is developed and released, not after.