DW NATURAL SUGARS
Montgomery
& Company

August 9, 2005

Arthur Neal, Director, Program Administration
National Organic Program
USDA–AMS—TMP–NOP
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Via Fax: (202) 205–7808

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

D.W. Montgomery & Company thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material:

Calcium Hydroxide as it is critical for the conversion of organic cane juice into organic granulated cane sugar. There are no other options for this and no known materials that will perform this function. Furthermore the ability to sweeten many organic food products relies on the use of organic sugar in the formulation and to make the products palatable to the consumer.

Native Corn Starch is another processing aid used in organic sugar for the production of organic powdered sugar. The corn starch is typically added at a 3% ratio and performs the function of an anti-caking agent. Organic corn starch is in very limited supply in the US and EU markets but not available in Central and south America where most of the organic sugar is produced

Sincerely,

David W. Montgomery, Sr.
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