SUNRISE®

Canada's leading tofu company

Date: August 15, 2005

Arthur Neal, Director, Program Administration
National Organic Program
USDA–AMS—TMP–NOP
1400 Independence Ave., SW., Room 4008
So. Ag Stop 0268
Washington, DC 20250

Dear Mr. Neal,

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.

Sunrise Soya Foods 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(s):

Calcium hydroxide, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." This substance is a processing aid in the production of organic cane sugar.

Sunrise Soya Foods currently uses organic cane sugar to produce organic tofu desserts under the Pete's brand name. Crystalline sugar of adequate quality cannot be produced without the use of calcium hydroxide, since there is no suitable alternative processing aid. Being a basic ingredient and the most versatile sweetener with unique clean flavor and easy to dissolve characteristics, organic cane sugar (made with calcium hydroxide) is essential in our formulation without which we would not be able to produce our organic tofu products.

In addition, please note that calcium hydroxide is permitted for use in the production of organic sugar under European Union regulation number 2092/91. The removal of calcium hydroxide from the National List and the resulting incompatibility between organic standards would all but eliminate the export of "organic", sugar-containing products to the EU, the largest market for US produced multi-ingredient products.

Sincerely,

Peter Joe
CEO Sunrise Soya Foods

Sunrise Soya Foods 729 Powell Street, Vancouver, BC Canada V6A 1H5
Phone (604) 253-2326 • Fax (604) 251-1083 • Website www.sunrise-soya.com