Weetabix of Canada Limited

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August 3, 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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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Weetabix of Canada Limited supports the continued allowance of the following substance(s):

| Name of Substance | Location on National List 205.605(a), 205.605(b), 205.606) | Reason for continued allowance. | Supporting Documents (List any research/ documentation supporting the necessity of using this material or the lack of OG alternatives to this material. Leave blank if you have none. |
|---|---|---|---|
| Citric Acid | 205.605(a) | Natural Flavour | Lack of organic equivalent available |
| Colour – Non-synthetic | 205.605(a) | Natural Colour – annatto and black carrot | Lack of organic equivalent available – organic annatto available is insufficiently concentrated to function – no black carrot extract available organically |
| Flavour – Non-synthetic | 205.605(a) | Natural Flavour | It is our experience that "organic" flavours that are available commercially are only reaching the 95% levels because of the use of organic carriers – the flavours themselves are still natural. This defeats the purpose of an organic flavour. That by using very large amounts of carrier the flavours are |

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| | | | too dilute to be effective equivalents to the ones now in use |
| Sodium Bicarbonate | 205.605(a) | Texture Modifier | Should be considered the way salt is considered – as a mineral it is natural and cannot be "organically produced" |
| Corn Starch - native | 205.606 | Carrier in Natural Flavours | Lack of organic equivalent available and not needed for natural flavours |
| Gums | 205.606 | Carrier in Natural Flavours | Lack of organic equivalent available and not needed for natural flavours |
| Ascorbic Acid | 205.605(b) | Fortification | Studies in the U.S. clearly indicate that the average American consumer is not getting sufficient nutrition without the use of fortification and that breakfast cereals have been identified as an excellent vector for better nutrition levels |
| Nutrient Minerals | 205.605(b) | Fortification | Studies in the U.S. clearly indicate that the average American consumer is not getting sufficient nutrition without the use of fortification and that breakfast cereals have been identified as an excellent vector for better nutrition levels. |
| Nutrient Vitamins | 205.605(b) | Fortification | Studies in the U.S. clearly indicate that the average American consumer is not getting sufficient nutrition without the use of fortification and that breakfast cereals have been identified as an excellent vector for better nutrition levels. |
| Tocopherols | 205.605(b) | Natural Preservative | Lack of organic equivalent available |

Sincerely,

Susan Abel

Susan Abel
Technical Services Manager
Weetabix of Canada Limited

Cc: Organic Trade Association
National Organic Standards Board

[redacted]

Attached is the website that contains the "Evaluation Criteria for Substances Added to the National List". It is highly suggested that this evaluation be submitted with comments.
http://www.ams.usda.gov/nop/Newsroom/SunsetDocFedReg06_05.pdf