To: National Organic Standards Board (NOSB)
RE: Handling Committee's recommendations for the definitions of "agricultural" and "non-agricultural"

New Chapter Inc. (NCI) supports the request to the NOSB by Marroquin Organic Commodities Services, Inc., on July 30, 3004, to reclassify yeast as an "agricultural product" instead of a "non-agricultural substance." This step is essential to the organic certification of yeast, to the increase in the number of organic ingredients available in the marketplace, to the increase in the amount of land dedicated to organic farming, and to the reduction of toxic substances allowed in products currently labeled as "organic."

We manufacture whole-food supplements, which are, for the most part, cultured with yeast and other organisms, making them more bio-available and vastly more complete in their nutritional values. Even before seeking and obtaining organic certification for forty of our products, we insisted upon the use of organic yeast, purchased from a European supplier. There is simply no place in our products for the caustic soda and sulfuric acid, amongst the other harmful chemicals, used in the production of commercial yeasts.

We are extremely concerned over—as well as confused by—the Handling Committee's (HC) recommendation relative to the definitions of agricultural and non-agricultural substances. We find the HC's distinction between mushrooms and yeasts to be arbitrary, and without foundation in good science. Yeasts and mushrooms are fungi, sharing broad genetic and metabolic characteristics (with each other, and to an interesting degree with mammalian life. Hence the common description of Saccharomyces cerevisiae, nutritional yeast, as a "mini-mammal.") Mushrooms have edible mycelia (the thin white filaments of a mushroom that coalesce into the fruiting body) that are one cell in thickness, and edible yeasts are single celled. The fact that one type of edible fungi is linear and another single celled is hardly a biological distinction on which organic status can reasonably rely. We rely on sound scientific reasoning to formulate our products, and we rely on the HC's use of that same reasoning when making their recommendations to the NOSB. We believe that the HC has stepped out of the realm of reason in this instance.

While it may seem to some like an absurd leap, we see little difference between the culturing of organic yeast (a mini-mammal) and the raising of organic cattle. Both organisms can be raised in an organic environment, fed organic nutrients, and allowed to propagate, reproducing organic strains. The complexity or simplicity of their cellular structures—or even the very number of cells that make up the organisms themselves—is not relevant to the issue at hand.

One of the touchstones of the organic industry is respect for the consumers' right to understand the source and nature of all ingredients, and our industry thus recognizes the indispensable importance of full disclosure. That fundamental respect for full disclosure leads, we believe, to an inevitable conclusion in this matter: consumers are entitled to know what their nutritional yeast is fed. Calling nutritional yeast non-agricultural doesn't change the facts: they are edible, they are grown, they are harvested, and they can be

grown and harvested organically. Under the principles of full disclosure that guide our industry, consumers should be allowed to have the organic choice.

Ironically, most consumers already believe that yeast is a natural product, but that is because conventional labeling laws do not require that the processes by which yeasts are produced be disclosed. However, a label that says “organic yeast” tells the consumer a lot about how that particular yeast is produced. Recognizing the true agricultural status of nutritional yeast will allow the natural product “perception” to be tested and validated under organic standards.

For all of the foregoing reasons, we respectfully urge the NOSB to approve the subject request to reclassify yeast as an agricultural product.

Respectfully submitted,

New Chapter, Inc.

By:_____
Thomas M. Newmark, President