

From: Pooler, Bob
Sent: Friday, April 04, 2003 7:04 AM
To: Rebecca Goldberg; David Carter; George Siemon; James Riddle; Michael Lacy; Nancy Ostiguy; Rebecca Goldberg; Rose Koenig ; Ann Cooper; Dennis Holbrooke; Owusu Bandele; T. Mark King; Goldie Caughlin; Kevin O'Rell; Kim Burton
Cc: Benham, Katherine
Subject: FW:

Importance: High
Comment on mineral oil, please include this comment within the Mineral oil review material for the May 2003 NOSB meeting.

Thank you

-----Original Message-----

From: Materials, NOSB
Sent: Thursday, April 03, 2003 9:22 PM
To: Pooler, Bob
Subject: FW:
Importance: High

From: Stan Goodrich[SMTP:STAN.GOODRICH@ALGILBERT.COM]
Sent: Thursday, April 03, 2003 8:52:25 PM
To: Materials, NOSB; pasmith(a)vt.edu
Cc: pnc(a)jps.net
Importance: High
Auto forwarded by a Rule

A.L.Gilbert Company

P.O. Box 38

Oakdale, CA 95361

April 3, 2003

NOSB Materials Committee

Washington, DC

Center for Food and Nutrition Policy

Virginia Tech University

Alexandria, VA

Dear members,

I am nutritionist and formulations manager for A.L. Gilbert Company, a major feed mill and mineral pre-mixer in California. We produce approximately 25,000 tons of vitamin/mineral pre-mixes a year.

I strongly support the use of mineral oil as a dust control agent in vitamin/mineral premixes for certified organic livestock production.

In our mill, we have been manufacturing organic mixes for certified organic dairy farms in the several years. Our system is monitored for dust releases by state and federal agencies. Eliminating dust control agents from the mineral mixing process could result in disciplinary action from EPA in regards to dust emissions outside of the plant and from OSHA in regard to dust level in the plant itself. A dust control agent of some kind is required in all mineral mixes at this plant.

From a facilities standpoint, we have determined that we will not dedicate holding tanks for an organic dust control agent if mineral oil is not allowed. As a result, we would either be forced out of business of manufacturing certified organic mineral mixes, or forced to hand-add the organic oil to the mixing process. We would be forced to buy the organic oil in small volumes from local retailers. The increased cost to the mix of this method would be more than any of the livestock operators would be interested in paying.

From a biological standpoint, mineral oil is the preferred product for control of dust. It is more stable than other oil products and does not go rancid. It is non-reactive to other nutrient ingredients in the mix as some other oils destroy vitamins. It is not adding extra or unnecessary nutrients to the diet as vegetable oil or adding high levels of vitamin E would. As a dust control agent mineral oil is usually included at 20 lbs per ton, which when fed at 0.5 to 1.0 lb in a total diet is a very small inclusion rate.

I strongly support allowing mineral oil to be used as a dust control agent in certified organic livestock production.

Sincerely,

Stanley G. Goodrich, PAS

Nutritionist

Stan.goodrich@al Gilbert.com <mailto:Stan.goodrich@al Gilbert.com>



tmp.htm (9 KB)