

Public Comment for NOSB Meeting September 17-19th

Hello, my name is Andrea Caroe and I am the VP of Certification Services for Quality Assurance International, a USDA accredited certifier. I would like to present the following concerns for your consideration and the consideration of the National Organic Program.

- QAI, as an accredited certifiers, takes our role in the verification of the National Organic Standards very seriously. In fact, the success of our accreditation is hinged on our ability to verify compliance to these standards. We are at the service of the NOP in the continued monitoring of the US organic market. In that vein, we ask the NOP^w refer all certified operation's questions regarding NOP compliance to the certifier of that inquiring party. It is our hope that the accreditation process has given the NOP confidence in our ability to apply the standard accurately and consistently. By allowing the certifier to apply the standard, the NOP will become more available to address appeals when applicants disagree with their certifier's decisions. Moreover, we would like to have access to the NOP staff for clarifications of unique situations that require further interpretation of the Rule.
- In situations when clarification is provided to a particular accredited certifier, we request that those clarifications be simultaneously posted on the NOP web site. We understand that this is a new regulation and that there will be issues that will not be discovered until specific situations arise. If the results of these evaluations are posted, other certifiers will not have to "re-invent the wheel". Moreover, this action will empower the rule in its ability to provide an "even playing field" among certifiers.
- We thank the NOSB and NOP for the clarification regarding percent calculation. This posting will allow for the consistent verification of organic processed products under all USDA accredited certifiers.

- Recently, the NOP provided a clarification on allowable chlorine levels in process water. QAI's first concern is that the clarification does not reflect the intent of previous TAP discussions. Secondly, the use of chlorine at high levels will increase the chance for THM contamination. Because historically organic operations have implemented systematic control at each step of their production, the operations are less dependent on high levels of disinfectants. Furthermore, chlorine use is not considered by the international community to be consistent with organic practices as evidenced by its prohibition in EEC2092/91. We ask that the NOSB under your charge of "material advisors" to the NOP, provide complete information and a recommendation on the subject to the NOP.
- QAI would like to express our support for the allowance for certification of "grower groups". Based on the overall idea of system based certification as opposed to product based certification, we feel that this is consistent with the intent of the regulation.
- Very recently, a recommendation was posted by the NOSB regarding "origin of livestock". In order for the organic community to provide a thorough comment with complete rationale and impact data, a full 60 days is needed. The posting provided for less than this required time period. We ask the NOSB to extend the posting on this very critical recommendation.
- Lastly, it has come to our attention that kelp may be re-listed under the 205.605 section. We contend that kelp is an agricultural product that is available through wild craft harvest as organic. We ask the NOSB to keep this material on the 205.606 list with requirements for commercial availability.

I thank you for the opportunity to provide comment on these topics. If I can provide further information that will help in your efforts, please do not hesitate to ask.