

SUBMISSION TO NATIONAL ORGANIC STANDARDS BOARD
MARCH 22, 2000

In 1998, while discussing my concern over a product that OMRI was considering as an allowable product for organic farming, Dr. Brian Baker stated that organic did not mean safe. I next heard that claim made by Dan Glickman, Secretary, Department of Agriculture, when he introduced the currently proposed National Organic Standards.

I do not wish to debate the propriety of that statement, but I do wish to point out that those comments are inconsistent with statements in the Federal Organic Foods Production Act of 1990 (the "Act"). I believe such thinking can lead to the destruction of the organic industry, as consumers currently think of organic foods.

Congress was concerned with public health when they passed the Act in 1990. In Section 6517(c)(1)(A) and Section 6517(c)(2)(A) substances that "would be harmful to human health or the environment" are prohibited. Section 6517(c)(1)(A) of the Act also requires that any exempted substance "is necessary to the production or handling of the agricultural product because of unavailability of wholly natural substitute products." Section 6518(m)(4) requires that the National Organic Standards Board (NOSB), when considering a substance for inclusion on the National List, consider "the effect of the substance on human health."

There are a large and growing number of individuals whose bodies are having difficulty dealing with the ever increasing number of toxins that are being introduced in and on the food at the farm or at food processing plants. Many of these people have learned that the way to avoid illness, often debilitating and even life threatening, is to only eat organic products. However, as organic standards are stretched and changed to increase production and accommodate the pressures from large corporations, more people are getting ill from organic foods, much as they do from conventional foods. Some of these people now only buy produce from farmers who they know to be using "old fashioned" organic farming techniques. They have stopped buying all processed foods, organic or conventional.

Consumers are depending on the NOSB to protect their interests and, at the same time, to preserve the organic standards in our country. With this in mind, I would like to make several comments regarding the proposed National Organic Standards (NOS) and related organic product approvals. These comments are based on a quick review of the NOS. Therefore, I may have additional comments later.

CONCERNS:

Section 205.600 of the proposed National Organic Standards deals with "allowed and prohibited substances and ingredients in organic production and handling." Although Section 205.600(a) prohibits synthetic substances, exceptions are listed in Sections 205.601 and 201.603. Section 205.600(b) prohibits the use of nonagricultural substances in or on processed products, with the exception of substances listed in 205.605.

OBJECTIONS

1. The allowed exceptions in Sections 205.601 and 205.603 make no reference to their effect on human health, as required by the Act, and as discussed in the third paragraph of this submission. Also, the exceptions make no mention of the need for the excepted substances to be unavailable through use of

a natural substitute. This grievous omission allows for the inclusion, for example, of neurotoxic amino acids that are known endocrine disruptors, and known causes of adverse reactions to humans, to be used on organic crops and in and on organic processed foods. Neurotoxic amino acids used on crops could be used in products categorized as herbicides, for plant disease control, for plant or soil amendment, as growth regulators, etc.

It is interesting to note that Section 205.601 lists under 205.601(j)(1), "Aquatic Plant Extracts (other than hydrolyzed)," but herbicides, plant disease control products, plant or soil amendment products, growth regulators, etc. may include hydrolyzed proteins since hydrolyzed proteins are not excluded. It should also be noted that liquid fish products that have been treated with acids are also provided for in the NOS, with no regard that such treatment will hydrolyze the protein, resulting in neurotoxic amino acids and carcinogens.

2. Section 205.605 specifically lists a number of processed food ingredients that are known to be used by food processors to introduce processed free glutamic acid (MSG) into processed foods without the knowledge of most consumers. Yet, the NOSB has not allowed the food ingredient "monosodium glutamate," which also contains processed free glutamic acid (MSG), to be used in processed organic products.

Scientists have determined that free glutamic acid should be avoided by people taking the popular drugs categorized as MAO inhibitors and by people with a predisposition or diagnosis of multiple sclerosis and amyotrophic lateral sclerosis (ALS). Free glutamic acid has also been implicated in other neurodegenerative diseases and found to cause learning disabilities, grotesque obesity, endocrine disorders, etc., in studies on experimental animals. Items of concern, listed in order of concern, in 205.605 are:

A. "Yeast - autolysate, brewers, and nutritional." The FDA has acknowledged that yeast extract, a yeast autolysate, contains MSG. A major producer of yeast extract has acknowledged that yeast extract contains from 7-24% free glutamic acid.

B. "Carrageenan." Based on reports from many MSG-sensitive people, carrageenan appears to be the most problematic ingredient used in processed food. It is believed that carrageenan breaks down surrounding protein, resulting in processed free glutamic acid (MSG).

C. "Enzymes." Many food processors have learned that some people avoid products that contain MSG, and some people recognize some of the names of ingredients that contain MSG without disclosure. Many of these processors have turned to the use of enzymes, realizing that the enzymes will hydrolyze protein during production, resulting in some processed free glutamic acid (MSG).

D. "Citric^{acid} and Calcium citrate." Most citric acid used today is made from corn. Producers of citric acid from corn do not take the time or undertake the expense to remove all protein. The remaining protein is hydrolyzed during production, resulting in some processed free glutamic acid (MSG). If only citric acid from citrus fruits were used in organic products, there would be no problem for MSG-sensitive people.

SUGGESTION

I have one suggestion for the NOSB. The ingredients used to make "flavor(s)" or "flavoring(s)," often listed on processed food labels along with the word "natural," is a serious problem for MSG-sensitive people. More often than not, such food ingredients include an ingredient that contains processed free glutamic acid (MSG). The NOSB would do a great service for the millions of people who are MSG-sensitive, and potentially greatly increase the market for organic processed foods, if the NOSB would require that all flavorings be free of any amino acids.

REQUEST

One final point. At the October, 1999 meeting of the NOSB, an application to approve free amino acids for organic crops and for use on livestock was not acted on. Rather, it was determined that application should be made for individual amino acids, and that the NOSB would consider such applications as received.

The Truth and Labeling Campaign and NOMSG, nonprofit organizations concerned with helping MSG-sensitive people, have received numerous complaints from people over the last 1-2 years who have reacted to vegetables that were not previously a problem for them. Some reported reactions involved organic vegetables. It was believed that such reactions were all due to a product that contains 29.2% processed free glutamic acid (MSG), AuxiGro WP Metabolic Primer (AuxiGro). However, AuxiGro has not been approved for use on organic crops.

We now have learned that OMRI has listed two hydrolyzed protein fertilizers on the "OMRI Brand Name Products List." Omega Protein Refined/Hydrolyzed Fish Emulsion was listed as "allowed" by OMRI in November, 1999 and Steam Hydrolyzed Feather Meal was listed as "allowed" by OMRI in 1998. These two products contain free glutamic acid. They pose a threat to human health, and can be replaced by natural products. They are in direct violation of the action of the NOSB at its October meeting.

I believe that OMRI should be asked to remove the two hydrolyzed protein fertilizers from their "Brand Name Products List," and refrain from listing products that are in violation of the Federal Organic Foods Production Act of 1990 and the position of the NOSB.

Respectfully submitted,



Jack L. Samuels
1547 Santa Sabina Court
Solana Beach, CA 92075

(858) 481-9333
adandjack@aol.com