

Recap of public comments submitted to:
The National Organic Standards Board
October 2012 meeting
Compiled by the staff of The Cornucopia Institute



C O R N U C O P I A

I N S T I T U T E

Livestock Subcommittee

Nonanoic Acid

Motion: To add Nonanoic to the National List 205.603

Petitioned: Stratacor, Inc. / **Purpose:** Control ectoparasites in cattle and horses.

	Support	Oppose
Farmers/Citizens	Peter Oberem, DVM, Afrivet Business Management, Ltd, Representing the South African Animal Health Association	3 citizens/farmers
Public interest groups	None	Beyond Pesticides The Cornucopia Institute
Handlers/Manufacturers	Emery Oleochemicals, Ann Petersman Emery Oleochemicals, Chris Ciolino	

Pet Food Amino Acids

Motion: To add ALL amino acids to the National List 205.603

Petitioned: Pet Food Institute / **Purpose:** nutritional supplementation

	Support	Oppose
Farmers/Citizens	None	60 citizens/farmers 7418 signatures on the petition by OCA
Public interest groups	None	Beyond Pesticides The Cornucopia Institute
Handlers/Manufacturers	Castor and Pollux Pet Works Proctor and Gamble Lortscher Agri Services	None
Trade Associations	Pet Food Institute	None

Pet Food Amino Acids - Taurine

Motion: To add only synthetic Taurine to the National List 205.603

Petitioned: LS (the petitioner requested all amino acids be listed) / **Purpose:** nutritional supplement for cats

	Support	Oppose	Concerns*
Farmers/Citizens	None	60 citizens/farmers 7418 signatures on the petition by OCA	
Public interest groups	None	Beyond Pesticides	
Handlers/Manufacturers	Castor and Pollux Pet Works (all amino acids) Proctor and Gamble (all amino acids) Lortscher Agri Services (all amino acids)	None	
Trade Associations	Pet Food Institute Organic Trade Association	None	
Certifiers	None	None	CCOF QAI

***Groups raising concern about regulating pet foods under livestock regulations**

Crops Subcommittee

Biodegradable Bioplastic mulch film

Motion: To add Biodegradable Bioplastic Biobased mulch film to 205.601(b)(2)(iii) to the National List

Proposed Annotation:

List on §205.601(b)(2) Mulches: (iii) Biodegradable biobased bioplastic mulch meeting the following criteria: (A) Completely biodegradable as shown by: 1) meeting the requirements of ASTM Standard D6400 or D6868 specifications, or of other international standard specifications with essentially identical criteria, i.e. EN 13432, EN 14995, ISO 17088; and 2) showing at least 90% biodegradation absolute or relative to microcrystalline cellulose in less than two years, in soil, tested according to ISO 17556 or ASTM 5988; (B) Biobased certified using the ASTM D6866 method; (C) Must be produced without excluded methods; (D) Must be produced without engineered nanomaterials; and (E) Grower must take appropriate actions to ensure complete degradation at the end of each growing or harvest season.

Petitioned: BPI Biodegradable Products Institute / **Purpose:** Weed control

	Support	Oppose	Needs further research
Farmers/Citizens	151 citizens/farmers	2 citizens/farmers	
Public interest groups	Nature Conservancy	Center for Food Safety Food and Water Watch	Beyond Pesticides The Cornucopia Institute
Handlers/Manufacturers	BPI Biodegradable Products Institute Novamont (Mater-bi) Dubois Agrinovation (Lise Martin)	CROPP Organic Valley Coop Organically Grown Company	
Trade Associations	Organic Trade Association USDA BioPreferred Program (Kate Lewis)		
Certifiers	NOFA-Vermont Oregon Tilth Certified Organic		California Certified Organic Farmers Organic Materials Review Institute Pennsylvania Certified Organic

Ferric Phosphate

Motion: to remove ferric phosphate from the National List

Petitioned: Steptoe & Johnson Law Firm / **Purpose:** slug control

	Support	Oppose	Allow ferric phosphate but review EDTA
Farmers/Citizens	10 citizens/farmers	12 citizens/farmers Oahu Army Natural Resource Program	1 farmer
Public interest groups	The Cornucopia Institute Beyond Pesticides		National Organic Coalition
Handlers/Manufacturers	Lonza, Inc.	Neudorff North America	None
Certifiers	None	Pennsylvania Certified Organic	CCOF

Oxidized lignite

Motion: To add PGML to the National List section 205.601(j)

Petitioned: SHAC Environmental Products, Inc. / **Purpose:** Soil amendment

	Support	Oppose
Farmers/Citizens	None	93 citizens/farmers
Public interest groups	None	Beyond Pesticides The Cornucopia Institute Organic Consumers Association
Handlers/Manufacturers	Organically Grown Company SHAC Environmental Products	None

PGML

Motion: To add PGML to the National List section 205.601 (e)

Petitioned: Otsuka Chemical Company, Ltd. / **Purpose:** Acaricide on crops

	Support	Oppose
Farmers/Citizens	None	85 citizens/farmers
Public interest groups	None	Beyond Pesticides The Cornucopia Institute Organic Consumers Association

Rotenone

Motion: To add rotenone to the National List section 205.602 as a prohibited natural substance

Purpose: Insecticide

	Support - remove rotenone from the NL	Oppose - Keep rotenone on the NL
Farmers/Citizens	6 citizens/farmers	None
Public interest groups	Beyond Pesticides The Cornucopia Institute National Organic Coalition	None
Handlers	Organically Grown Company	Dole Fresh Fruit International, Ltd.
Trade Associations	None	ASOBAN - Association of banana growers in Peru ASOGUABO - Association of banana growers in Ecuador ASOCIACION REGIONAL DE PEQUENOS PRODUCTORES BANANEROS CERRO AZUL Ecuador
Certifiers	Pennsylvania Certified Organic	None

Sulfuric Acid

Motion: To add sulfuric acid to the National List section 205.601

Petitioned: BioStar Systems, LLC / **Purpose:** Stabilize anaerobically digested poultry manure

	Support	Oppose
Farmers/Citizens	None	94 citizens/farmers 7418 signatures on a petition
Public interest groups	None	Beyond Pesticides The Cornucopia Institute Organic Consumers Association

Handling Subcommittee

Ascorbyl Palmitate

Motion: To add to the National List 205.605 for use as a preservative in infant formula

Petitioned by: the International Formula Council / **Purpose:** preservative

	Support	Oppose
Farmers/Citizens	1 citizen (Richard Theuer—industry consultant)	78 citizens 7418 signatures on a petition
Public interest groups	None	Beyond Pesticides Center for Food Safety The Cornucopia Institute Food and Water Watch National Organic Coalition
Handlers	The Hain Celestial Group	None
Trade Associations	International Formula Council	None

Beta Carotene

Motion: To add to the National List 205.605 for use as a preservative in infant formula

Petitioned: the International Formula Council / **Purpose:** preservative

	Support	Oppose
Citizens	1 citizen (Richard Theuer—industry consultant)	78 citizens 7418 signatures on a petition
Public interest groups	None	Beyond Pesticides Center for Food Safety The Cornucopia Institute Food and Water Watch National Organic Coalition
Handlers	The Hain Celestial Group	
Trade Associations	International Formula Council	

Lutein

Motion: To add to the National List 205.605

Petitioned: by Kemin Foods / **Purpose:** nutritional supplement in infant formula

	Support	Oppose
Citizens/Scientists	Dr. Elizabeth Johnson –Tufts (consultant to petitioner) Dr. Richard Theuer (industry consultant)	78 citizens 7418 signatures on a petition
Public interest groups	None	Beyond Pesticides Center for Food Safety The Cornucopia Institute Food and Water Watch National Organic Coalition
Handlers/Manufacturers	The Hain Celestial Group Kemin Foods	None
Trade Associations	International Formula Council	None

Lycopene

Motion: To add to the National List 205.605 for use in infant formula

Petitioned: the International Formula Council / **Purpose:** nutritional supplementation

	Support	Oppose
Citizens	1 citizen (Richard Theuer—industry consultant)	78 citizens 7418 signatures on a petition
Public interest groups	None	Beyond Pesticides Center for Food Safety The Cornucopia Institute Food and Water Watch National Organic Coalition
Handlers	The Hain Celestial Group	None
Trade Associations	International Formula Council	None

L-carnitine

Motion: To add to the National List 205.605 for use in infant formula only

Petitioned: International Formula Council / **Purpose:** amino acid for use in infant formula

	Support	Oppose
Citizens	1 citizen (Richard Theuer—industry consultant)	78 citizens 7418 signatures on a petition
Public interest groups	None	Beyond Pesticides Center for Food Safety Food and Water Watch National Organic Coalition
Handlers	The Hain Celestial Group	None
Trade Associations	International Formula Council	None

Raising issue of essentiality in soy-based formula only: The Cornucopia Institute

L-methionine

Motion: To add to the National List 205.605 for use only in infant formula made with isolated soy protein

Petitioned: International Formula Council / **Purpose:** amino acid – prevent “failure to thrive” in infants fed soy-based formula

	Support	Oppose
Citizens	1 citizen (Richard Theuer—industry consultant)	78 citizens 7418 signatures on a petition
Public interest groups	None	Beyond Pesticides Center for Food Safety Food and Water Watch National Organic Coalition
Handlers	The Hain Celestial Group	None
Trade Associations	International Formula Council	None

Raising issue of essentiality in soy-based formula: The Cornucopia Institute

Nucleotides

Motion: To add to the National List 205.605.

Proposed annotation: Nucleotides—allowed for infant formulas only in the “organic” and “made with organic categories”.
Nucleotides are allowed for the “made with organic claim” on all other food products.

Petitioned: International Formula Council / **Purpose:** nutritional supplementation

	Support	Oppose
Citizens	1 citizen (Richard Theuer—industry consultant)	78 citizens 7418 signatures on a petition
Public interest groups	None	Beyond Pesticides Center for Food Safety The Cornucopia Institute Food and Water Watch National Organic Coalition
Handlers	The Hain Celestial Group	None
Trade Associations	International Formula Council	None

Taurine

Motion: To add to the National List 205.605 for use in infant formula only

Petitioned: International Formula Council / **Purpose:** nutritional supplementation

	Support	Oppose
Citizens	1 citizen (Richard Theuer—industry consultant)	78 citizens 7418 signatures on a petition
Public interest groups	None	Beyond Pesticides Center for Food Safety The Cornucopia Institute Food and Water Watch National Organic Coalition
Handlers	The Hain Celestial Group	None
Trade Associations	International Formula Council	None