



April 14, 2016

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket:** AMS-NOP-15-0085

**RE: Handling Subcommittee – Proposals to add sodium lactate and potassium lactate to the National List as allowed antimicrobials used in meat processing**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Handling Subcommittee's Proposal regarding the allowance of sodium and potassium lactate.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA does not have a conclusive position on whether these two substances should be allowed in organic processing. We do agree however that they should be taken through the required petition process as is now being done. We offer the following additional information that may be helpful.

The subcommittee is proposing to add sodium and potassium lactate to the National List as allowed synthetics for use as an antimicrobial agent and pH adjuster only.

As explained in the proposal, both sodium lactate and potassium lactate have been allowed for use in organic handling since their approval by NOP on January 22, 2004. This decision (to not require a petition for sodium and potassium lactate for inclusion to the National List) was originally based on the fact that all three of the materials used to produce sodium lactate and potassium lactate (lactic acid, sodium hydroxide and potassium hydroxide) were already approved and on the National List. OTA agrees that NOP's decision was not consistent with previous NOSB recommendations on classification of materials and we support NOSB's efforts to take these two materials through the appropriate petition process to see whether or not they meet OFPA and National List criteria.

Member outreach was inconclusive as to whether these two materials are needed. In terms of usage, it appears that it is primarily used as an antimicrobial agent and sodium lactate is more commonly used. One

member reported the use of high pressure processing as an effective alternative, however we expect that this technology is very expensive and is out of reach for many small and regional operations, particularly artisan and specialty meat processors. Another member using sodium lactate expressed that they would be discontinuing its use regardless of whether it stays on the National List or not.

We also note that sodium lactate is allowed under the European Union (EU) organic regulations as an approved food additive for use in processing foodstuffs of animal origin only and is listed as follows: "Milk-based and meat products." Potassium lactate, however, is not allowed in the EU.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,



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Senior Director of Regulatory and Technical Affairs  
Organic Trade Association

cc: Laura Batcha  
Executive Director / CEO  
Organic Trade Association