

April 7, 2015

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-15-0002

RE: Handling Subcommittee: Sunset 2016 Boiler Chemicals

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Handling Subcommittee's Sunset proposal on the continued use of three boiler additives currently allowed on 205.605(b) of the National List restricted for packaging sterilization use only: 1) Cyclohexylamine, 2) Diethylaminoethanol, and 3) Octadecylamine.

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 the growth of organic trade to benefit the environment, farmers, the public and the economy.

Consistent with our comments submitted in fall 2014, we believe that the following allowed boiler chemical additives may no longer be essential:

1. Cyclohexylamine (CAS # 108-91-8)
2. Diethylaminoethanol (CAS # 100-37-8)
3. Octadecylamine (CAS # 124-30-1)

OTA is committed to collecting information from our broad membership in order to determine whether or not a substance on the National List remains essential to organic production and/or handling. Handling materials that have been placed onto the National List should remain on the National List if: 1) they are still essential to and compatible with organic handling practices; 2) there are no commercially available alternative (natural / organic) materials or practices; and 3) no new information has been submitted demonstrating adverse impacts on humans or the environment (OFPA SEC. 2118 [7 U.S.C. 6517 and 6518] National List).

The information OTA collected shows that the use of these materials for packaging sterilization in organic handling is no longer needed. Instead, a mechanical device (a steam generator) may be used at the point in which packaging sterilization is needed. In other words, rather than using steam generated from the



boilers that feed the entire facility, a separate and dedicated steam generator is used at the necessary point of contact.

During OTA's outreach process, we received comments that we believe are important for NOSB to be aware of. It's often most challenging for the small- to medium-sized food producers and processors to adopt alternative practices when a capital investment in new equipment is involved. Over 60% of OTA members are small businesses. We make this point in consideration of timelines that may be needed for organic operations, particularly small operations, to transition and comply with new requirements.

In conclusion, OTA believes that the three boiler additives scheduled to sunset in 2016 may no longer be essential. We thank NOSB for conducting a thorough review and carefully considering public comments. It's critical that NOSB hear from certified farmers and handlers on whether these inputs are necessary, or whether there are other effective natural or organic alternatives available.

Again, on behalf of our members across the supply chain and the country, OTA supports the National List process, and we're committed to decisions that will both encourage the development and use of organic ingredients and support the use of the organic label.

OTA thanks NOSB for the opportunity to comment and for your commitment to furthering organic agriculture.

Respectfully submitted,

Gwendolyn Wyard
Senior Director of Regulatory and Technical Affairs
Organic Trade Association

cc: Laura Batcha
Executive Director / CEO
Organic Trade Association