



April 6, 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 – Ancillary Substances: Enzymes, Yeast, Microorganisms, Dairy Cultures and Nutrient Vitamins and Minerals

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Handling Subcommittee's request for more information on the ancillary substances contained in several National List items.

The Organic Trade Association (OTA¹) supports NOSB review of "other ingredients." The uniformity and integrity of material review decisions are of paramount importance to the entire organic supply chain. We continue to advocate for a policy that will facilitate efficient review, and allow consistent compliance decisions at both the NOSB level (Generic Material review) and at the Accredited Certifying Agent (ACA) and Material Review Organization (MRO) level (Brand Name material review).

OTA submitted separate comments on the proposal specific to ancillary substances permitted in microorganisms. In addition to information on microorganisms, OTA also received information through our electron survey system on the ancillary substances that may be used in dairy cultures, yeast and nutrient vitamins and minerals.

The following ancillary substances are reported as "missing" from NOSB's chart for microorganisms:

- Potassium phosphate
- Potassium sulfate
- Tricalcium phosphate

¹ 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.

The following ancillary substances may be used in **dairy cultures**:

Acetic acid
Ammonium phosphate
Anhydrous dextrose
Calcium carbonate
Calcium chloride
Citric acid
Cryo-protective agents unknown
Cultured corn syrup solids
Dextrose
Diammonium phosphate
Disodium phosphate
Fructooligosaccharide
Hydrolyzed casein
Lactose
Magnesium Citrate
Magnesium sulfate
Maltodextrin
Milk
Nonfat dry milk
Potassium citrate
Protease
Sodium acetate
Sodium chloride
Sodium formate
Sodium phosphate
Sucrose
Sugar
Whey powder
Yeast extract

The following ancillary substances may be used in **yeast**:

Ascorbic acid
Cane molasses
Cereal grains
Folic acid
Niacin
Propylene glycol anti-foam
Potato starch
Pyridoxine hydrochloride
Riboflavin
Sorbitan monostearate
Soybean hulls
Starch
Thiamine hydrochloride
Vitamin B12
Wheat middlings

The following ancillary substances may be used in **nutrient vitamins and minerals**:

Acacia gum, corn starch, medium chain triglycerides (from palm oil), modified food starch, sucrose, sunflower oil, sodium ascorbate crystalline, silicon dioxide, tocopherols, maltodextrin, polysorbate 80, propylene glycol, glycerol monooleate, triglycerol monooleate, citric acid, and sodium benzoate.

OTA also worked in collaboration with the Enzyme Technical Association² (ETA) to compile the following list of ancillary substances that may be used in **enzyme** products:

Current List of Formulation Ingredients Compiled by NOSB:

Functional Class	Substance Name
Anti-caking & anti-stick agents	Magnesium stearate, calcium silicate, silicon dioxide.
Carriers and fillers, agricultural or non-synthetic	Lactose, maltodextrin, sucrose, dextrose, potato starch, non-GMO soy oil, rice protein, grain (rice, wheat, corn, barley) flour, milk, autolyzed yeast, inulin, cornstarch, glycerol, potassium chloride, ammonium sulfate.
Carriers and fillers, synthetic	Micro-crystalline cellulose, propylene glycol, stearic acid, dicalcium phosphate.
Preservatives	Sodium benzoate, potassium sorbate, ascorbic acid.
Stabilizers	Maltodextrin

ETA List of Formulation Ingredients:

Functional Class	Substance Name
Anti-caking & anti-stick agents	Calcium silicate, calcium stearate, magnesium silicate/talc, magnesium stearate, magnesium sulfate, silicon dioxide, sodium aluminosilicate.
Carriers and fillers	Ammonium sulfate, autolyzed yeast/yeast extracts, barley grain, barley meal, calcium phosphate, calcium acetate, calcium carbonate, calcium chloride, calcium sulfate, corn flour, corn grain, corn steep liquor (powder), corn starch, dicalcium phosphate, dextrin, dextrose, dried glucose syrup, ethyl alcohol, flour, glucose, D-glycerol, glycol, inulin, lactose, lactic acid, maltodextrin, maltose, mannitol, microcrystalline cellulose, milk, mineral oil, potassium chloride, palm oil, potato starch, propylene, propylene glycol, purity gum (starch), rice grain, rice protein, saccharose, sorbitol, soy flour, soy oil, starch, sucrose, sunflower oil, stearic acid, trehalose, vegetable oil, water, wheat (flour/grain/starch).
Preservatives	Alpha (hops) extract, ascorbic acid, benzoic acids and their salts, calcium propionate, citric acid, potassium chloride, potassium phosphate, sodium acetate, sodium chloride, sodium benzoate, sodium propionate, sodium sulfate, sorbic acid and its salts, stearic acid, tannic acid, trisodium citrate, zinc sulfate.

² The Enzyme Technical Association (ETA) is a trade association of companies that represents manufacturers and marketers of enzyme products in North America, including the United States, Canada and Mexico. ETA has been in existence since 1970, and has taken an active role in assisting in the development of regulations and policies that affect the enzyme industry.

Stabilizers	Betaine (trimethylglycine), glucose, glycerol, maltodextrin, sodium chloride, sodium phytate, sorbitol, sucrose.
pH control, buffers	Acetic acid, citric acid anhydrous, sodium citrate, sodium phosphate, trisodium citrate.

On behalf of our members across the supply chain and the country, OTA thanks NOSB for the opportunity to comment and for your commitment to furthering organic agriculture. We hope this information will help your review process.

Respectfully submitted,



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

cc: Laura Batcha
Executive Director / CEO
Organic Trade Association