



October 4, 2018

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2642-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket:** AMS-NOP-18-0029

**RE: Crops Subcommittee – Sodium Citrate (Proposal)**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Crops Subcommittee’s Proposal on Sodium Citrate, which has been petitioned for addition to §205.601 for use as an anticoagulant in the production of blood meal.

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 over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

### **Summary**

- ✓ OTA appreciates that the subcommittee is considering the implications of how its decision on this petition may impact other processing aids used in manufacturing crop input materials. In NOSB’s final recommendation, we ask that it explain how the decision is intended or not intended to impact others materials, so that this decision can be implemented consistently by the organic community.
- ✓ As an alternative to adding the portioned material to the National List, NOSB could consider recommending an update to NOP Guidance 5034-1 Materials for Organic Crop Production.

### **We offer the following more detailed comments:**

#### Background

Sodium citrate has been petitioned for use as an anticoagulant when drying blood into blood meal that is then used as a crop fertility input. Sodium citrate, a salt derivative of citric acid, is routinely used as a processing aid in the manufacturing of blood meal. Sodium citrate is already being used to produce blood meal products approved for use in organic production.

Implications of this decision on other processing aids

As the subcommittee explains in its proposal, NOSB has not routinely been asked to review processing aids used in the production of crop fertility inputs. The subcommittee is unclear how its decision for this material would affect the allowance or prohibition of other processing aids that have not yet been reviewed by NOSB. There is also a question of how/where processing aids for crop inputs should be listed on the National List.

OTA appreciates that the subcommittee is considering the implications of how its decision on this petition may impact other processing aids used in the manufacturing of crop fertility inputs. Regardless of whether NOSB decide to list or not list this material, it will nevertheless raise questions about whether this type of processing aid is within the scope of review by NOSB. If NOSB recommends that the petitioned material should be added to the National List as petitioned, it could indicate that any synthetic anticoagulant has to be petitioned and listed on the National List to be allowed. It may raise questions about other processing aids used in the manufacturing of other input materials. The manufacturing processed of input materials, even though ultimately classified as non-synthetic, will commonly use processing aids such as extractants. NOP Guidance 5033 Classification of Materials<sup>1</sup> generally allows for the use of synthetic extractants during the extraction of agricultural materials as long as the extractant has been removed from the final product such that it has no technical or functional effect in the final product.

In the final recommendation, we ask that NOSB clearly explain how the recommendation is intended or not intended to impact others materials, so that the decision can be implemented consistently by the organic community. It would be unfortunate for NOSB's decision on this petition to cause unintended disruptions of the current practices used by material reviewers for evaluating processing aids used in crop inputs.

Option to update NOP Guidance 5034-1 instead of amending National List

As an alternative to adding a new listing and/or new section for the petitioned material on the National List, NOSB could consider recommending an update to NOP Guidance 5034-1 Materials for Organic Crop Production<sup>2</sup>. As stated, this document is intended to guide the organic industry regarding materials for use in organic production. The entry for *blood meal* could be updated to address additional guidance from NOSB regarding the allowance or prohibitions on the use of anticoagulants as processing aids.

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,



Johanna Mirinda  
Farm Policy Director  
Organic Trade Association

cc: Laura Batcha  
Executive Director/CEO  
Organic Trade Association

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<sup>1</sup> <https://www.ams.usda.gov/sites/default/files/media/NOP-5033.pdf>

<sup>2</sup> <https://www.ams.usda.gov/sites/default/files/media/NOP-5034-1.pdf>