



August 21, 2015

Kevin Pollack
Vice President, Sales & Marketing, Business Development & M & A
Stericycle Expert Solutions US Office
2670 Executive Dr., Ste. A
Indianapolis, IN 46241

Dear Mr. Pollack,

As the executive director and CEO of the Organic Trade Association (OTA), I am writing to you in regards to your most [recent press release](#), claiming that the organic food industry is one of the key factors behind the surge in healthy product recalls.

OTA is the leading voice for the organic trade in the United States, representing more than 8,500 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 press release in question is misleading, as it lumps organic with other products that do not share similar properties and overstates the recall percentages for organic foods.

The healthy food category, for example, is listed with the claim that the surge of recalls in this category is driven by the organic food industry, which insinuates a decrease in the safety of organic products. However, the percentage of the healthy food category made up by organic products is not included in the press release. Additionally, the healthy food category is not well defined. Are items such as cookies and chips listed as "healthy foods" if they are organic, but would not be listed as such if they were not organic? This would lead to an inaccurate classification of organic items, which would lead to biased results.

Additionally, you are quoted in the [New York Times article](#) as stating, "what's striking is that since 2012, all organic recalls have been driven by bacterial contamination, like [salmonella](#), listeria and [hepatitis A](#), rather than a problem with a label." Based on analysis done by OTA and by Gwendolyn Wyard, Senior Director of Regulatory and Technical Affairs for OTA, this statement directly contradicts the data released by the FDA and FSIS. In 2015 several organic recalls were due to non-pathogen related events including possible foreign matter contamination, undeclared milk, undeclared soy, and undeclared almond and wheat. The same is true for 2014: both FDA and USDA recalls of organic products included events including possible foreign matter contamination, undeclared milk, undeclared soy, and choking hazard.

The press release also ignores the rarity of events of organic contamination that originate at the producer level, called source events. A single contamination event at the producer level could lead to multiple recalls. For example, if there is contamination of organic spinach from a producer it will result in multiple recalls at the distributor level. In 2014 and 2015 contamination events in organic were extremely low, with 5 total original source events in 2015 and 12 original source events in 2014.



Finally, the press release suggests that the increase in recalls between 2012 and 2015 is due to a decrease in the safety of organic products. This is misleading, however, because an overall increase in organic recalls between 2012 and 2015 is more likely due to the increased market for organic products. Sales of organic food in the U.S. have risen by almost 25 percent since 2012, and the number of organic products on the market is increasing steadily as demand for organic grows. It is common sense that as the number of products available increases, the number of recalls of that product would also rise.

OTA supports the efforts of the USDA and FDA in their testing and recall protocols. The organic industry places the highest value on the quality and safety of its food products. Organic products are the most highly regulated foods in the United States – a fact that organic producers are proud of because it helps ensure the safety of their products. Your press release contains inaccurate, misleading information that does not reflect the high excellence that organic products must be held to during the USDA certification process.

Given the importance of this topic to our members and to the organic sector as a whole, we would appreciate the opportunity to meet with your CEO and technical team at a mutually convenient time so we can further discuss the issue.

Thanks for your consideration. We look forward to hearing from you.

Respectfully,

Laura Batcha
Executive Director and CEO
Organic Trade Association (OTA)

CC: Charles Alutto, President and CEO, Stericycle, Inc.
Gwendolyn Wyard, Senior Director of Regulatory and Technical Affairs, Organic Trade Association
Dr. Jessica Shade, Director of Science Programs, The Organic Center