



October 8, 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-15-0037

RE: Crops Subcommittee – Petition to remove Lignin Sulfonate

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the Crops Subcommittee (CS) and National Organic Standards Board (NOSB) on the petition to remove Lignin Sulfonate (LS).

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

OTA submitted a petition on November 6, 2014, to remove LS from the National List as an allowed synthetic floating agent in post-harvest handling of organic crops. NOP determined the petition to be complete and forwarded it to NOSB on December 18, 2014. We submitted comments to NOSB at the spring 2015 meeting's first round of Sunset Review for this substance. We appreciate the CS decision to act on OTA's petition and move forward a recommendation that would remove LS from the National List for use as a flotation agent in post-harvest handling of organic products. We fully support the position of the subcommittee, and encourage the full Board to vote to remove this substance from the National List. Our comments from the spring 2015 meeting are reiterated below:

Background

This substance was primarily used in the organic pear industry as a floating agent in organic packing sheds. OTA's outreach to the organic pear industry indicated that no companies currently handling organic pears use LS, as most have moved to modernized equipment not requiring the use of flume water to transport fruit down the packing line. The few companies that continue to pack pears using flume water use other allowed floating agents (sodium silicate, sodium carbonate, or potassium carbonate), mainly because of LS's incompatibility with chlorine sanitizers used for food safety concerns. The removal of LS from the National List will not directly result in the increased use of other floating agents because the few companies continuing to use wet packing lines have already made the switch to other allowed substances.

Conclusion

The organic pear industry has evolved since LS was originally added to the National List. Pear packers no longer use this substance, and the availability of additional allowed substances that serve the same function as a flotation aid indicate that it is time for this substance to be removed from the National List. We urge NOSB to vote for removal of LS from the National List as a post-harvest flotation agent.

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.

Respectfully submitted,



Nathaniel Lewis
Senior Crops and Livestock Specialist
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association