



October 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-15-0037

RE: Handling Subcommittee – Proposals to add sodium lactate and potassium lactate to the National List as allowed antimicrobials used in meat processing

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Handling Subcommittee's Proposal regarding the allowance of sodium and potassium lactate. OTA does not have a conclusive position on whether these two substances should be allowed in organic processing. We do agree however that they should be taken through the required petition process as is now being done. We offer the following additional information that may be helpful.

The subcommittee is proposing to add sodium and potassium lactate to the National List as allowed synthetics for use as an antimicrobial agent only. The subcommittee is not expressing concerns about human health or environmental impact and ancillary substances do not appear to be used. In order to help inform the final decision, the subcommittee is requesting the following information:

Additional information regarding the extent that these two materials are being used;

- Additional ways that these materials are currently being used other than the original petitioned use (microbial use for meat and poultry); and
- Between sodium lactate and potassium lactate which one is more commonly used than the other?

As explained in the proposal, both sodium lactate and potassium lactate have been allowed for use in organic handling since their approval by NOP on January 22, 2004. This decision (to not require a petition for sodium and potassium lactate for inclusion to the National List) was originally based on the fact that all three of the materials used to produce sodium lactate and potassium lactate (lactic acid, sodium hydroxide and potassium hydroxide) were already approved and on the National List. OTA agrees that NOP's decision was not consistent with previous NOSB recommendations on classification of materials and we support NOSB's efforts to take these two materials through the appropriate petition process to see whether or not they meet OFPA and National List criteria.

Member outreach was inconclusive as to whether these two materials are needed. In our review, however, we believe any allowance should be limited to microbial use for meat and poultry processing. In terms of usage, it appears that sodium lactate is more commonly used. One member reported the use of high pressure processing as an effective alternative, however we expect that this technology is very expensive and is out of reach for many small and regional operations, particularly artisan and specialty meat



processors. We also note that sodium lactate is allowed under the European Union (EU) organic regulations as an approved food additive for use in processing foodstuffs of animal origin only and is listed as follows: “Milk-based and meat products.” Potassium lactate, however, is not allowed in the EU.

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,

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

cc: Laura Batcha
Executive Director / CEO
Organic Trade Association