



March 30, 2017

Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW.,
Room 2642-S., Mail Stop 0268
Washington, DC 20250-0268

Submitted via www.regulations.gov

RE: Docket: [AMS-NOP-16-0100](#) NOP-16-11

NOSB Handling Subcommittee Proposal: Ancillary Substances Permitted in Cellulose

Dear NOSB members:

Thank you for the opportunity to provide comments on the Proposal for allowed ancillary substances permitted in cellulose. MOSA certifies approximately 2000 organic operations throughout the United States, including 215 food processors and handlers. We certify several processors using cellulose in their organic products.

We appreciate the ongoing consideration of ancillary substances in National List materials, but we still have concerns regarding the practicality of the implied increased burden on certifiers, as we must verify compliance of additional, insignificant substances. Nevertheless, we recognize that this new part of the sunset review process, though it may impact our work on a daily basis, represents due diligence and will provide needed clarification regarding any substances that might be of concern.

In our previous comments regarding ancillary substances, we noted how, in our certification review work, we must make decisions on many materials each day. Cellulose is among many materials we review. It's our role to measure these decisions against a framework laid out in the standards, including National List annotations, and in NOP Instruction or Guidance documents. The NOSB and NOP should clearly establish this framework. Over the years, we've struggled with clarity on which ancillary substances should be subject to our review, and with how to make decisions regarding those substances. While we appreciate the information presented in this document, we also find a regulatory and verification burden in reviewing ancillary materials *and the functional class they fall into*. We request that the NOSB take into consideration the challenges for certifier review of materials if this proposal were to pass as is.

With this proposal, the NOSB has established functional classes of substances that would be allowed for use in cellulose. Any ancillary substances used in cellulose production must fall into one of the functional classes outlined in this document, or it would be required to be petitioned

for addition to the list. Working with suppliers of non-organic materials to verify compliance can be complex and often arduous. Manufacturers frequently struggle to understand verification that is needed in order to approve a material's use. If we must verify not only which materials are used in production of individual cellulose products, but also which functional class they fall into, a layer of complexity will be added to our work. From the information presented in this document, it is not entirely clear whether this new layer is practical, or would hold value, for the review of cellulose.

While we're still looking for ways to make adequately addressing ancillaries less burdensome in our review work, we would like to point out that this document clearly reiterates that cellulose is not only essential for organic handling, but the material itself and the ancillary substances identified in the document align with the spirit of the National Organic Standards; their use is not of concern to human health or the environment. If this is the determination of the NOSB, then it is difficult to see how our review of functional classes of individual materials used in cellulose on a substance by substance basis will strengthen the organic integrity of products in which cellulose is used.

This document has the potential to set a precedent for certifier review of ancillaries materials. It is important *now* to establish a clear process by which all ancillary substances will be reviewed, and how the review is communicated to certifiers for enforcement. MOSA continues to encourage a thorough NOSB material review process, which names reviewed ancillaries and identifies them as allowed or prohibited, and which enables reasonable decision-making as new ancillary substances may be identified. Prohibited ancillaries, such as mineral oil that is not highly refined as described in this document, could then be added as an annotation on the National List. We appreciate robust NOSB review of materials. This enables clarity for our industry and for certifiers.

Thank you for your work on this challenging and perhaps precedent-setting issue.

Respectfully submitted,

The MOSA Certification Team