



December 17, 2019

Robert Pooler, Standards Division, National Organic Program  
USDA-AMS-NOP  
1400 Independence Ave. SW  
Room 2642-S., Ag Stop 0268  
Washington, DC 20250-0268

RE:Docket Number AMS-NOP-19-0023, NOP-19-01, and/or Regulatory Information Number (RIN) 0581-AD83

Dear Mr. Pooler:

MOSA appreciates the opportunity to provide comments to the National Organic Program regarding the [proposed rule](#) for the addition of Blood Meal—Made With Sodium Citrate to the National List. MOSA certifies almost 2,200 operations throughout the United States with the majority of our certified entities located in the Upper Midwest. Approximately 1,870 are operations that grow crops. MOSA currently has approximately 45 producers who use an input containing blood meal, though that number will likely increase in 2020 as we fully implement our new materials database which enables us to see exactly which products are in use by exactly which clients. In total, we have reviewed and approved approximately 20 “blood meal” products (that’s products with “blood meal” in the product name), but we have reviewed about 90 products with blood meal as an ingredient. With some perspective provided below, we encourage NOP to rethink addition of this material to the National List.

While blood meal can be made from fresh blood without the use of processing aids, it seems this is uncommon. Slaughter facilities use a considerable amount of anticoagulants, including citric acid, sodium citrate, and EDTA, in blood to keep it in a liquid state to enable further processing. When reviewing inputs, we have always considered the anticoagulants used during the processing of blood to be part of the standard composition of blood used to make blood meal.

Blood meal and feather meal are listed on [NOP 5034-1](#) as “nonsynthetic” with no added annotations, whereas meat byproducts are listed as nonsynthetics but are only allowed without synthetic solvents or colors. That annotation considers inputs of concern that may be added during the processing of meat byproducts. The anticoagulants used during the blood processing keep the blood liquified to enable processing into other forms, including blood meal, however, the anticoagulant has no technical function in the blood meal. If we follow the principle outlined in the NOP’s guidance decision tree for synthetic/nonsynthetic decision making ([NOP 5033](#)), we would not consider the anticoagulant during the review of the blood meal because *“a material may be classified as nonsynthetic (natural) if the extraction or separation technique results in a material that meets all of the following criteria: Any synthetic materials used to separate, isolate, or extract the substance have been removed from the final substance (e.g., via evaporation, distillation, precipitation, or other means) such that they have no technical or functional effect in the final product.”*

In the proposed rule, the comparison is made to liquid fish pH adjustment synthetics. However, we'd conclude they are not comparable, since the pH adjuster has a technical function in the final liquid fish product - to maintain a low pH. Anticoagulants in blood meal have no technical effect in the final product, nor are they added ingredients in the final product. Implications go beyond this one listing.

Certifiers should rely on the reference 5034-1 to call out any concerns and identify any added ingredients of concern in other natural inputs. In all cases we can think of where we've been concerned about added synthetic ingredients in otherwise nonsynthetic inputs, NOP 5034-1 has been a great resource.. A few examples include:

*-Mined Minerals: Mined minerals are permitted if not processed or formulated with prohibited materials, such as synthetic dust suppressants, anti-caking agents, or pelleting agents.*

*-Sodium Chloride: Table salt. Mined sources and evaporation from natural brines only. Must not contain synthetic anti-caking agents not provided for at § 205.601.*

*-Sphagnum Moss: Must not contain synthetic wetting agents.*

*-Phosphate Rock: Must not be fortified or processed with synthetic chemicals. Includes colloidal phosphate rock.*

We encourage NOP to consider anticoagulants as part of the blood that then becomes blood meal, a standard identity for blood. We do not support the addition of Blood Meal- made with sodium citrate to the National List of synthetics allowed for use in organic crop production. We advocate for continued consideration of this material as nonsynthetic.

Thank you for the opportunity to provide comment on this rule addition.

Sincerely,

The MOSA Certification Team