

Ami Freeberg

The National List of Allowed and Prohibited Substances for organic agriculture and processed products carries a weight and expectation of upholding clear guidelines that build consumer trust and confidence in the certification. Below I have comments on the proposed rule to amend the National List. A.I oppose addition of low-acyl gellan gum. When I see the petition to add low-acyl gellan gum to the National List is led by CP Kelco, a manufacturer of the product, it erodes my trust in the process behind adding this product to the list. I also noticed that the NOSB's recommendation was based on their review of the petition, stakeholder comments, and a third-party technical report, but no public comment. The process described to create low-acyl gellan gum does not align with what I value about organic products as a consumer. As a small farm educator, the addition of this product does nothing to support the organic farmers who are the foundation of the organic industry. B.I support the addition of paper-based planting aids. These products are tools to dramatically improve efficiency in transplanting for organic farmers, as well as to reduce the use of plastic pots. The material is consistent with the already approved substance of newspaper as mulch and compost feedstock. Further, it is not a substance that is directly consumed by an eater, so the “synthetic” definition is of less concern to me. Finally, I appreciate that public comments, as well as a third-party technical report, were considered in the NOSB’s decision to recommend the addition of paper-based crop planting aids to the National List. C.I support the correction of the spelling error to change wood resin to wood rosin. Thank you for your consideration.