

Eleanor Ross

The National List of Allowed and Prohibited Substances for organic agriculture provides a standard for producers in the immediate future with major consequences in soil, crop production, and public health. Under this proposed rule, I have outlined my opposition and support concerning low-acyl gum, paper-based planting aids, and resin clarification. I oppose adding low-acyl gellan gum to the National List of Allowed and Prohibited Substances section of the USDA's organic regulations. While allowed by the FDA for food consumption, low-acyl is still an added synthetic, brought forth for review by CP Kelco. I understand the arguments that it's similar gellan gum, high-acyl, is an approved gum, low-acyl has no natural alternatives, and no adverse health effects have been reported. In this way, low-acyl does meet the criteria to be added to the National List. However, the primary proponent of this addition is CP Kelco, a company directly benefiting from the inclusion of low-acyl on the National List. With more research as to the toxicity and exposure, paired with public comments, I would be more inclined to include the synthetic gellan. Until that time, I am opposed adding low-acyl to the National List of Allowed and Prohibited Substances due to lack of complete, unbiased information. I agree with the recommendation to add paper-based crop planting aids to the National List. This recommendation is well prepared with farmers, gardeners, and growers alike. This addition will effectively and immediately benefit small scale farmers in crop planting. I agree with the recommendation from clarifying 'wood resin' to 'rosin'. Thank you for your time and consideration of these points.