



April 12, 2016

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-S Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-15-0085
RE: Handling Subcommittee – Nutrient Vitamins and Minerals Annotation Change (Discussion)

Dear Ms. Arsenault,

Thank you for this opportunity to provide comment on the Handling Subcommittee's Discussion Document on changing the annotation on the listing for Nutrient Vitamins and Minerals.

Of the options offered in the discussion document, Wolf, DiMatteo + Associates (WDA) generally supports Option 2 as it reflects most accurately the intent of the 1995 NOSB recommendation. However, the annotation can be more concise if stated: 'Vitamins and minerals identified as essential in 21 CFR 101.9, or as required for infant formula by 21 CFR107.100 or 107.10.' The essential and required nutrients found in the FDA Code of Federal Regulations are found in the references in the annotation and ensure proper supplementation to maintain health and wellness of adults and infants.

Nutrient vitamins and minerals should be allowed in or on products labeled as 'organic' or 'made with organic.' WDA does not support restricting the use of these synthetic vitamins and minerals to the 'made with organic' category. Although there are claims that those who purchase organic products do not want any synthetic ingredients allowed in products labeled 'organic', we believe that there are consumer expectations that organic products are nutritionally equal to their conventional counterparts.

If non-synthetic vitamins and minerals are to be allowed they must be petitioned to be added to Section 205.605 (a) in order to ensure that the production, ingredients and ancillary substances meet the requirements of the USDA Organic Regulations and are vetted through a Technical Review and public comment.

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P.O. Box 458, New Castle, VA 24127
Tel 540-864-5107 • Fax 540-864-5161 • Info@OrganicSpecialists.com
www.OrganicSpecialists.com

It is unfortunate that the 2012 proposed rule on nutrient vitamins and minerals, which was based on the NOSB discussion and public comments on the 2011 Handling Subcommittee recommendation, was never completed. We are hopeful that the comments received on this current discussion document will lead to publication of a Final Rule by the National Organic Program. Organic businesses and their customers will most certainly benefit from an accurate, precise and updated listing for the use of nutrient vitamins and minerals on the National List.

We recognize and appreciate the commitment of the NOSB members to consider the full range of stakeholder opinions and, through a deliberative process, without individual bias, make recommendations to advance the organic sector. Thank you.

Sincerely,

Bill Wolf, Katherine DiMatteo and Sandy Mays
Partners

The partners and associates of Wolf, DiMatteo + Associates have over 100 years of combined experience in the organic sector. We have served hundreds of farms and businesses with their organic production systems and regulatory compliance, both nationally and internationally. We have been involved in the founding of several key organic organizations including the Organic Trade Association, Organic Materials Review Institute and the Organic Center. We are fiercely committed to continual improvement and to provide our clients and the organic sector with the tools to advance organic, environmental, and social practices.