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DATE: 8/16/05
TO: Arthur Neal, NOP
RE: Comments on Sunset of Materials on the NL
FROM: DAVID ENGEL, Executive Director, Nature's International Certification Services

Dear Arthur,

Concerning the issue of sunset of materials on the National List, I offer the following comments:

1) In general + for my purposes + from my experience in working with the NL + with many many clients, the National List as it stands is fine. Frankly, there are too few materials on the NL.

2) Specifically, though, as the NOSB's + NOP's attention is drawn to individual items on the list (eg oxytocin, ivermectin), it will be necessary to consider + review these individual items, IF it is felt to be necessary by whomever, +, of course, per the petition process.

3) I emphasize IF, as, again, for my purposes as a farmer + from my experience as a farmer + a certifier, I feel that the NOP as it stands + the process that has occurred over the past 13 or 14 years regarding creation of the NL are sufficient + are serving the organic community satisfactorily. Again, my basic view is that there are too few materials approved for use.

4) In sum, given that the current NL has served a critical albeit self-limited purpose over these years for us to use + choose materials from, it would be best, in my opinion, to have/leave as many items on the current NL list as possible. I support the current NL as it stands.

I appreciate everyone's efforts + interests in this matter. Thank you for this opportunity to comment.

DAVID ENGEL