PURITY YOU CAN TASTE

August 15, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So. Ag Stop 0268
Washington, DC 20250

Email: National.List@usda.gov

Fax: (202) 205-7808

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket Number TM-04-07. Lundberg Family Farms supports the continued allowance of the substances on the attached list. These substances are used on our farms and/ or in our handling and processing facilities. They are an essential part of the organic system we use to produce our products. We are not aware of any new information in the last five years that indicates these substances are not safe and suitable for use in organic foods.

If you would like any specific supporting information for any of these substances, please let us know.

Sincerely,

Bryce Lundberg
VP Agriculture
bryce@lundberg.com

Cc: Organic Trade Association

LUNDBERG FAMILY FARMS
5370 CHURCH ST
PO BOX 369
RICHVALE, CA 95974
PHONE 530.882.4551
FAX 530.882.4500
WWW.LUNDBERG.COM

NATIONAL ORGANIC MATERIALS SUNSET REVIEW: REQUEST FROM LUNDBERG FAMILY FARMS TO CONTINUE TO ALLOW

Name of Substance	Location on National List	Reason for Continued Allowance
Chlorine materials - residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.	205.601 (a) 2 205.605 (b)	This is critical for food safety purposes.
Boric acid - structural pest control, no direct contact with organic food or crops	205.601 (e) 2	When needed, boric acid is an important pest control tool. Because there are few options for pest control substances, we would like to have this remain on the list as an option if needed.
Sticky traps/barriers	205.601 (e) 8	Sticky traps and barriers are one of the most common types of substances used to control pests. Essential for use in organic production to control pests as the choices are limited. Used both by producers and handlers in the organic industry.
Copper sulfate – used in a manner that minimizes accumulation of copper in the soil	205.601 (i) 2 205.601 (j) 6	Used for plant disease control.
Micronutrients – not to be used as defoliant, herbicide or desiccant. Soil deficiency must be documented by testing.	205.601 (j) 6 i. 205.601 (j) 6 ii.	Several micronutrients are used as fertility supplements by growers. Micronutrients are important to optimize the soil condition to obtain the best crop quality.
Liquid fish products - can be pH adjusted with sulfuric, citric or phosphoric acid.	205.601 (j) 7	Liquid fish products are used as a fertility supplement.
Acids - citric - produced by microbial fermentation of carbohydrate substances	205.605 (a)	Lundberg Family Farms uses citric acid in the formula of a flavored rice cake.
Carbon dioxide	205.605 (b)	Carbon dioxide is an essential component for effective control of pests in stored organic grains.
Silicon Dioxide	205.605 (b)	Silcon Dioxide is used to prevent caking in organic spices. It is prefered by some food makers because it is approved by European organic standards.