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August 16, 2005

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

Subject: Docket Number TM-04-07

Dear Mr. Neal:

On behalf of the American Spice Trade Association (ASTA), I am pleased to submit the following comments in response to the notice, "National Organic Program, Sunset Review" 70 Fed. Reg. 35177 (June 17, 2005). ASTA represents the interests of approximately 300 members including companies that grow, dehydrate and process spices. ASTA members and their customers produce spices and spice blends certified as organic under the National Organic Program.

ASTA Requests Renewal of Certain Items in Section 205.605

ASTA requests that the National Organic Standards Board renew the exemptions allowing the use of the following items as nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or made with organic (specified ingredients or food groups), § 205.605:

- Acids, citric,lactic
- Colors - nonsynthetic sources only
- Flavors - nonsynthetic sources only
- Sodium bicarbonate
- Carnauba wax
- Yeast - nonsynthetic only
- Alginates
- Ascorbic acid
- Chlorine materials
- Lecithin - bleached
- Silicon dioxide
- Xanthan gum

The items listed above are important to ASTA members as either components of certified organic spice blends or as processing aids used in their production. Therefore, ASTA requests that the NOSB renew the exemptions allowing their use.

ASTA Requests Renewal of Certain Items in Section 205.606

ASTA requests that the National Organic Standards Board renew the exemptions allowing the use of the following items as nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or made with organic (specified ingredients or food groups), § 205.606:

- Cornstarch, native
- Gums - water extracted only (Arabic, guar, locust bean, carob bean)

We are grateful for the opportunity to comment during the Sunset Review, and we are available to provide additional information to the NOSB.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Deem', with a stylized, cursive script.

Cheryl Deem
Executive Director