



September 29, 2022

National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue SW
Washington, D.C. 20250-0268

Re: NOSB Spring 2022 Docket No. AMS-NOP-22-0042

PCC Community Markets (PCC) would like to thank the National Organic Program (NOP) and the National Organic Standards Board (NOSB) for the opportunity to provide comments on the NOSB's agenda and the NOP program.

PCC is the nation's largest community-owned food market, with over 100,000 active members, 16 stores across the Puget Sound region, and nearly \$400 million in sales. PCC's vision is to inspire and advance the health and well-being of people, their communities, and our planet. It is our mission to ensure that good food nourishes the communities we serve while cultivating vibrant local, organic food systems.

Supporting the organic food supply system has always been a PCC priority, because of its benefits for people and the planet. This is why we not only prioritize organic products and advocate for organic food systems at local, state, and national levels, but also voluntarily participate in the organic supply chain as a **certified organic retailer**.

As a part of our commitment to organic, PCC is a full member of the National Organic Coalition (NOC) and encourage members of the NOSB to review the detailed and collaborative comments submitted on behalf of all NOC members. On most of the topics, agenda items, and recommendations we agree with NOC and support their thoughtful and carefully crafted positions. On two topics, however, PCC would like to provide our individual perspective, unique experience, or additional information to assist in the NOSB deliberations:

A. Organic and Climate-Smart Agriculture

We want to thank the NOSB for their informative discussion document on organic and climate-smart agriculture. Creating this document was an essential first step towards educating the public and policymakers concerning the ready-to-use system that soil-based, organic certification and farming practices provide in our fight against climate change and movement towards a planet and people conscious food system.

We support many of the recommendations, including a need for aligned reporting frameworks, clearer communication to new and existing producers concerning organic soil health benefits, better emphasis and accounting of synthetic pesticides and inputs within current climate-smart

frameworks, and the outlining of critical research initiatives. Most importantly, we want to voice our support for the recognition that “certified, farmers lead the way with the implementation of climate-smart practices and should automatically qualify for any climate-smart label”—with one caveat: automatic recognition of organic as climate-smart must only apply to soil-based producers. Making this distinction would ensure that any climate-smart label applied to organic delivers on the *soil* health principles it claims to represent.

We also want to impress on the NOP and United States Department of Agriculture (USDA) the importance of a renewed education and marketing campaign concerning the strong, verifiable connection between soil-based, organic production and climate-smart agriculture. The strength of the organic label is not only in its production methods and legally backed standards, but in its marketplace value and economic benefits. USDA’s announcement of the Organic Transition Initiative and other organic acknowledgments in recent months have been a welcome shift, but there is more work to do to preserve and promote this invaluable system and community of environmental leaders. As a retailer we are pained and concerned to see the consumer confusion concerning regenerative and climate-smart claims that have no aligned definition, no third-party verification, and often little if any connection to truly climate beneficial practices and principles. We are frustrated with having to be the educator on these differences with little support from the institutions that should be holding up organic as a leading solution.

This is not to say that organic does not have areas that need improvement or that would benefit from the integration of new principles we are all learning about climate-smart agricultural practices. We also need to see stronger enforcement on the very requirement that the NOSB has so diligently outlined and a commitment from the NOP to move quickly to adopt new regulations that build on this soil-health foundation. Lastly, we must consider how to build in mechanisms and training that will allow organic producers to not only receive recognition as climate-smart via labels and certifications, but also benefit financially from the carbon markets that are expanding across the country.

II. Petitioned & Sunset Handling Materials

PCC again encourages the NOSB to review NOC’s comments on the majority of sunset and petitioned materials; however, we wish to provide additional comments on the following material:

A. (B) Sunsets: Sodium phosphate

PCC does not support the relisting of sodium phosphate because of health concerns the availability of viable alternatives to sodium phosphate in dairy products. Additionally, there are some instances where sodium phosphate are merely added to enhance the optics of the product or match how conventional products look, such as stabilizing heavy creams to prevent separation—an issue easily overcome by instructions to “shake before use” on the package.

PCC firmly believes that organic products should be healthier alternatives to their conventional counterparts, especially when it comes to processed food items. While we always encourage

and support a diet of unprocessed, wholesome foods, we also recognize that in today's world convenience or pre-made foods are sometimes necessary, but organic products should provide options with reduced potential impacts on health. Furthermore, based on the many questions we receive from our shoppers about ingredients, we know that our shoppers do not want unnecessary additives in their foods.

While we recognize the argument that sodium phosphate is one of a few allowed in organic, we would still encourage the NOSB to sunset the material and consider removing others as they come up for sunset. As isolated ingredients, they do not pose significant health risks. However, there is growing concern over the cumulative impact of diets higher in phosphate due to widespread use. This has been an increasing trend, but not one that is new. The Joint FAO/WHO Expert Committee on Food Additives noted in 1982 when evaluating phosphates that further studies should be conducted to better understand the health impacts of phosphate additives in food.¹ Not only are phosphate additives widely used, but they're also absorbed by the body much more readily than when found naturally in foods, which makes their ubiquitous presence even more concerning. Under current FDA food labeling laws, phosphorous content is optional for companies to disclose on nutritional labels, which means consumers cannot quantify or track carefully how much inorganic phosphorous they may be consuming. It is important that organic be the option shoppers can choose to help minimize their exposure to synthetic phosphate additives or avoid them completely, through an all-organic diet.

Lastly, we strongly encourage the NOSB to carefully consider the presence of phosphate additives in US organic products considering that only monocalcium phosphate is permitted, and only as a leavening agent, in the CODEX, EU, and Japanese organic regulations.

For the reasons listed above, including public health, the integrity organic, and alignment with other global organic regulations, we implore the NOSB to seriously consider sunsetting sodium phosphate from the NL and take one step closer to eliminating phosphates from organic foods.

III. Conclusion

PCC would again like to thank the NOSB for its diligent work to uphold and advance the integrity of the organic label on which we all rely.

Sincerely,

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