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October 1, 2013

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

Re: AMS-NOP-13-0049

**Comments to the NOSB Handling Subcommittee regarding
Polyalkylene Glycol Monobutyl Ether (PGME)**

Dear Ms. Arsenault:

Pennsylvania Certified Organic (PCO) welcomes the opportunity to provide comments to the National Organic Standards Board (NOSB) regarding the subcommittee proposals to be discussed at the upcoming business meeting. PCO is an NOP-accredited certifying agent that certifies more than 700 operations, including around 165 crops operations, 385 livestock operations, 120 processor/handler operations and various combinations of these categories.

Polyalkylene Glycol Monobutyl Ether (PGME)

The Handling Subcommittee has proposed that Polyalkylene Glycol Monobutyl Ether (PGME) be removed from the NOSB work plan after the Fall 2013 meeting and that the NOP should notify the petitioner that PGME is not eligible for petition to §205.605(b) because it is not used in direct contact with organic products.

PCO supports the position that non-volatile boiler chemicals such as PGME are not eligible for inclusion on the National List because this substance is not used in direct contact with organic products. Non-volatile boiler chemicals should be allowed for use without being on the National List provided that the operator takes appropriate measures to prevent contamination of organic products from contact with the boiler chemical (§205.272(a)).

Non-volatile boiler chemicals, when used properly, will stay within the boiler water and

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not volatilize into the boiler steam. If the boiler steam is being used in direct contact with organic products, the chemicals from the non-volatile boiler chemical will not be in the steam and will not contact organic products. A well-maintained boiler system and use of the chemical according to label instructions should allow the product to function as expected, and not pose any threat of contamination to the organic products.

PGME clearly fits the classification of a non-volatile boiler chemical as described by the technical report “PGME is non-volatile and precipitates at boiler temperatures. Thus, it is not delivered with steam, but stays in the boiler as a precipitate until the boiler cools below the cloud point. Practically, PGME does not contact food” (Technical Evaluation Report, June 7, 2013, Lines 113 – 115).

PCO allows non-volatile boiler chemicals to be used by certified organic handling operations, provided that the operator documents the methods they use to ensure that chemical does not carry over into the steam and contact organic products. This includes maintaining records that the boiler is properly maintained, and that the boiler chemicals are being used according to the manufacturer’s instructions.

PCO appreciates the opportunity to provide comments and thanks the NOSB members for their careful consideration.

Sincerely,



Johanna Miranda
Policy Director