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September 30, 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: Docket: AMS-NOP-13-0049
NOSB Handling Sub-Committee
Petitioned Material Proposal Glycerin**

Oregon Tilth supports the proposed removal of Glycerin from 205.605(b) of the National List.

Oregon Tilth collected information from various certified organic operations, and several key points related to organic glycerin production and availability were noted:

- Operators indicated that compared to years passed, market volatility has decreased and there are no issues with purchasing organic glycerin in the quantities necessary for use in organic production.
- The price of organic glycerin has significantly decreased over time, and has become less prohibitive to operations to include in their formulations.
- The quality of organic glycerin has greatly increased to match the quality of conventional glycerin. This increase in the availability of quality material has bolstered the use of certified organic glycerin by some operations.

Overall, with the current availability of quality organic glycerin on the market, lowered costs due to increased production, and the current widespread use in certified organic products, there appears to be sufficient quantity and quality of organic glycerin to support the removal of Glycerin from 205.605(b) of the National List.

Respectfully Submitted,

Oregon Tilth

Oregon Tilth is a nonprofit organization supporting and promoting biologically sound and socially equitable agriculture through education, research, advocacy, and certification. Oregon Tilth advocates sustainable approaches to agricultural production systems and processing, handling, and marketing.