



October 4, 2018

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP

**Docket:** AMS-NOP-18-0029

**RE: National Organic Standards Board (NOSB) – Consideration of Pullulan Petition**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comments on the NOSB Handling Subcommittee's Discussion Document on the Pullulan Petition (the OTA Pullulan Petition) initiated by the Organic Trade Association (OTA).

The American Herbal Products Association (AHPA) is the national trade association and voice of the herbal products industry. AHPA is comprised of domestic and foreign companies doing business as growers, collectors, processors, manufacturers, marketers, importers, exporters and distributors of herbs and herbal products.

AHPA's members are engaged in the commerce of herbs and herbal products in the United States and in other countries that have regulations regarding labeling of foods and other products that are produced and handled according to organic agricultural practices. Many of these member companies grow herbal crops and market herbal products such as dietary supplements that are certified as organic under USDA's National Organic Program (NOP) and that are therefore subject to controls regarding the use of non-organic constituents such as pullulan capsules. The matter of NOP compliant herbal supplements has been of interest to AHPA's members for many years and AHPA has maintained a guidance document since 2013 to assist members who market dietary supplements produced in compliance with the NOP and containing NOP organic botanical ingredients.

These comments are therefore submitted on behalf of AHPA's members, since many of the dietary supplements that are marketed as NOP organic are based on botanical ingredients. The OTA Pullulan Petition was submitted in support of companies that are manufacturing and selling USDA-NOP certified dietary supplements that utilize pullulan-based capsules. The OTA petition advocates for the **continued** allowance of non-organic pullulan used in dietary supplements labeled "**made with organic [specified ingredients or food group(s)]**". Should this allowance be discontinued, AHPA members have indicated that significant disruption to their businesses is possible, due to the lack of reasonably available alternatives to non-organic pullulan capsules.

AHPA is aware that OTA is separately submitting comments in support of their Pullulan Petition to allow for the addition of pullulan capsules to the National List, which is the subject of the NOSB Handling Committee's Discussion Document. AHPA expresses its full support for these OTA comments and agrees with its conclusions that taking such action would avert significant disruption to the organic dietary supplement industry, as well as encourage the commercial development of certified organic pullulan.

AHPA greatly appreciates the opportunity to present comments on this petition process. We welcome any questions that may arise from AHPA's comments and look forward to NOSB's recommendation.

Respectfully submitted,



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