Section 6

Na True

3.17 essential oil: *The non-aqueous oil obtained from plant matter that may be volatilized by steam. Citrus oil is considered an essential oil because of its composition (to be adopted to point 6.4.2)*

In this formulation other manufacturing processes are missing such as e.g. extraction using CO_2 or the extraction of resins. This is why the wording should be changed and the definition under *6.4.2* included:

6.4.2 Essential oil
Essential oils expressed, distilled, or extracted from organic plant material shall be considered fully organic.

3.19 ethoxylation: *A chemical process in which a raw material is catalyzed with potassium hydroxide and dried under vacuum, after which ethylene oxide is added as a reagent to form a new material.*

This wording only describes a selection of possibilities. It would be better to use the generally applicable formulation:

A chemical process in which ethylene oxide or another alkyl epoxide is added as a reagent to form a new material.

3.56 salt: *Sodium chloride, unless otherwise specified*
6.3.2 Salt
Salt is sodium chloride, not containing any additives or flow agents that are not specifically allowed on the National List.

For a standard for cosmetics the definition of salt should include all inorganic salts not just table salt as for a foodstuffs standard.

6.3.1 Water
Water used as an ingredient or processing aid shall meet or exceed the USEPA National Primary Drinking Water Regulations (40 CFR part 141) or the WHO Guidelines for Drinking-Water Quality.

This point can be deleted, since it is already covered by 3.68.

6.3.2 Salt
Salt is sodium chloride, not containing any additives or flow agents that are not specifically allowed on the National List.

This point can be deleted, since it is already covered by 3.56.

6.2 Calculating organic percentage

In addition to water and salt all minerals should be listed here - for they too can never be organic.

6.3.1.1 Reconstitution
When a standard of identity exists or there is an onsite scientific method used to remove moisture from a plant, water can be added back into that plant product and still be considered as part of the original plant. For instance, a concentrate that fulfills the organic requirements of this Standard can be rehydrated back to single strength or back to the same moisture content it had when harvested or first tested; the added water shall be considered part of the organic content of that ingredient or product.
Added water shall be included in the organic content of an ingredient only under the following circumstances:
– Reconstituting juice concentrates back to their USDA single strength standard of identity; and
– Reconstituting aloe concentrates to single strength based on Aloe Council compliance and standards. Water content of extracts and hydrosols are specified in 6.4 of this Standard.
NOTE – Water added to rehydrate dried powders or dried plant material is counted as added water. Manufacturer-specific 'standards of identity' regarding water content, single strength values, or moisture content are not acceptable.

We consider this approach to be inconclusive. If water is extracted then it should, as a matter of principle, not be re-included in the calculations. Why is it that concentrates and aloe receive different treatment here to other drugs? There is a danger that because of the exceptions made for juices and aloe e.g. a small amount of 0.3% of a dried aloe extract will be used 200:1. Using reconstitution a very high percentage of organic can be achieved from this small amount (in certain circumstances over 50%). This is misleading for the consumer.

6.5 Organic percentage of a reacted ingredient
The values in table 5.1 shall be used in calculating the organic percentage of a final product using reacted ingredients. Although most of the products of the specified reactions are likely to be restricted to the "made with" label category, the percentage listed shall not be the final determinant of that category.

See commentary on *Table 5.1.*

Table 5.1:

We would like to question why the use of certain processes means that certification as "organic" should no longer be possible.

Consumers see the difference between "made with organic xxx" and "95% organic" only as an expression of the organic material it contains, and not as a reflection of the manufacturing process of the raw materials.

We are of the opinion that for all those processes allowed under the NSF Standard the labelling as "organic" must be possible.

As already described above, for the calculation of "organic" that amount of the substance that has the potential to be organic (e.g. in glucosidation 98%) should be taken.

Terressentials

6.2/6.3 -- Minimally, simple water and/or filtered, processed NOP compliant mined minerals should be neutral ingredients, as are water and salt. This is referred to in 7.2.1.

6.4.2 -- Essential oils should NOT be "extracted" with solvents.

Oh, Oh Organic, Inc

Under 6.2 the responsibility for determining the “organic content” is solely assigned to the handler – there does not appear to a requirement that the “organic content” be verified by the certifier. This appears to be self certification. Was this intended?

6.3.2 – Which “National List”?

6.4.3.2 – What does “fully organic” mean? Is this 100%, 95% . . .??