



## Council for Responsible Nutrition

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April 08, 2011

Ms. Patricia Atkins  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave, SW  
Room 2646-So., Ag Stop 0268  
Washington, DC 20250-0268

Re: Docket Number AMS-NOP-11-0014

Dear Ms. Atkins:

The Council for Responsible Nutrition (CRN)<sup>1</sup> is a Washington, DC-based trade association representing the dietary supplement industry. Our members include some of the largest and most well known ingredient suppliers, manufacturers, direct sellers and retailers of dietary supplements. CRN appreciates the opportunity to provide comments on the USDA's organic food fortification policy.

CRN supports efforts to ensure that a fact-based understanding of consumer preference, expectations, and trends is used to accurately answer the question of consumer acceptance and desire for nutrient-enriched organic foods and their compatibility with organic handling systems. Organic consumers are increasingly choosing foods that contain added nutrients, vitamins and minerals to ensure they meet all of their individual nutritional requirements throughout all phases of life. Age, gender and dietary choices (vegetarian, vegan, etc.) lead consumers to seek a variety of sources of key nutrients such as vitamin B12, folic acid, potassium, calcium, iron, or omega-3 fatty acids. In fact, the 2010 Dietary Guidelines for Americans have identified that intake of several of these key nutrients is low enough to be

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<sup>1</sup> The Council for Responsible Nutrition (CRN), founded in 1973 and based in Washington, D.C., is the leading trade association representing dietary supplement manufacturers and ingredient suppliers. CRN companies produce a large portion of the dietary supplements marketed in the United States and globally. Our member companies manufacture popular national brands as well as the store brands marketed by major supermarkets, drug store and discount chains. These products also include those marketed through natural food stores and mainstream direct selling companies. In addition to complying with a host of federal and state regulations governing dietary supplements, our 70+ manufacturer and supplier members also agree to adhere to voluntary guidelines for manufacturing, marketing and CRN's Code of Ethics. Learn more about us at [www.crnusa.org](http://www.crnusa.org).

considered a public health concern<sup>2</sup> in the U.S. It would be unfortunate if consumers of organic foods were forced by federal policy to choose between the organic foods they desire or non-organic enriched foods that provide the added nutrients they seek. Fortification of organic foods with nutrients, vitamins and minerals allow these consumers choice in meeting all their nutritional needs.

An overly restrictive fortification policy may have the unintended consequence of negatively impacting organic businesses, the certified farmers who produce organic foods and the retailers who sell organic products. Currently, organic foods are routinely fortified with nutrients, vitamins and minerals—best selling products include infant formula, breakfast cereals, nutrition bars, baby food, milk, dietary and herbal supplements and pet food. The Organic Trade Association estimates that fortified organic foods account for almost half a billion dollars in annual commodity ingredient and retail sales of certified organic products. It is important to protect those consumers who currently choose organic foods that are fortified with essential nutrients. Furthermore, a federal organic fortification policy that does not allow organic foods to be fully fortified seriously limits the growth potential of the industry and will limit innovation of novel products.

In summary, CRN supports a “Yes” vote on the proposed advisory committee recommendation to the USDA. CRN supports a policy that continues to allow for the use of vitamins, minerals and micronutrients as long as the fortification material is currently permitted for use in food products by the FDA. In addition, it is our opinion that the Handling Committee proposed recommendations would harmonize the rules on fortification, supplementation and enrichment of organic food products with the rules governing other foods in a manner that avoids unnecessary conflict with other statutes and governmental agencies.

Thank you,

Douglas MacKay, ND

A handwritten signature in black ink, appearing to read "D. MacKay", with a checkmark at the end.

Vice President  
Scientific & Regulatory Affairs  
Council for Responsible Nutrition

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2010 Dietary Guidelines for Americans. Chapter 4. Food and Nutrients to Increase.  
<http://www.cnpp.usda.gov/Publications/DietaryGuidelines/2010/PolicyDoc/Chapter4.pdf>