

Honor
Organic Consumers Association
6771 South Silver Hill Drive
Finland MN 55603

Hello Honor,

Thank you for taking my call last month in regards to organic wine. As promised here is a summary of my exhaustive research on the topic. I write you on behalf of not only our company, Organic Vintners, but also on behalf of the organic industry in the spirit of education and avoiding misinformation and confusion about organic wine.

The link *Clearing up the Confusion about Organic Wine* serves to further confuse rather than clarify the issues of organic wine. The story claims there are 4 categories but there are only two, and they are both organic. Organic wine is unlike any other food and beverage category covered in the USDA's National Organic Program. Through our reading of the entire National Organic Program¹ regulations, I summarize the facts:

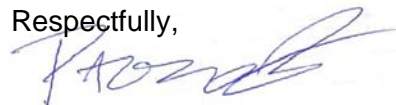
1. There is no 70% (made with) rule for ingredient requirements in organic wine as in all other food and beverage categories.
2. Wine is singled out in a "product composition" statement requiring 100% organic ingredients as follows in CFR, Title 7, Subpart D, § 205.301 (f), (5), (7):
 - a. All products labeled as "100 percent organic" or "organic" and all ingredients identified as "organic" in the ingredient statement of any product:
 - (5) must not contain sulfites, nitrates, or nitrites added during the production or handling process, except, that, wine containing added sulfites may be labeled "made with organic grapes";
 - (7) must not include organic and nonorganic forms of the same ingredient.
3. Section 205.605 further clarifies sulfite content as follows:
 - a. § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))."
Sulfur dioxide—for use only in wine labeled "made with organic grapes," Provided, that, total sulfite concentration does not exceed 100 parts per million (ppm).
4. Code of Federal Regulations available at <http://www.gpoaccess.gov/cfr/index.html> and more specifically at http://www.access.gpo.gov/nara/cfr/waisidx_07/7cfr205_07.html

Only in organic wine must 100 percent of the product—wine grapes—be certified organic, even when the product is not allowed to use the USDA Organic seal. This is confusing and shows no immediate sign of becoming any less so, despite efforts by our company and others to make organic wine regulations in parity with other "organic category" standards.

While we appreciate the fact that you chose to cover the confusing organic wine in the story, we believe the writer assumed that the regulations for "Made With Organic" grapes are the same as food. We hope you take note of the important facts that are most often misquoted by the press.

Your readers are likely wine enthusiasts and increasingly concerned about the environment and their health. We hope this information is helpful in eradicating the errors in organic wine reporting. We also are happy to serve as a resource to you in the future on organic wines and the overall organic industry.

Respectfully,



Paolo Bonetti, President

¹ Code of Federal Regulations, Title 7-Agriculture, Part 205-National Organic Program, Subpart D-Labels, Labeling, and Market Information, § 205.301-Product Composition, (f) (5) and (7), and § 205.605.