



“Organic Water” Scheme Threatens Meaningful U.S. Organic Standards for Food and Personal Care

Rutgers University Study Exposes Need for USDA Action on OCA Complaint

LITTLE MARAIS, MN--- Can tap water be considered an organic ingredient? This is the fundamental question the **Organic Consumers Association (OCA)** asks the **USDA's National Organic Program (NOP)** in a recently filed Complaint against the **Bayliss Ranch** and their certifier **Quality Assurance International (QAI)**. USDA must respond to the OCA complaint in the next 90 days. OCA believes the NOP will launch a formal investigation to determine if Bayliss Ranch's water extracts should lose their organic certification for trying to pass water off as an organic ingredient in food and personal care products.

“The outcome of this complaint to USDA will be a good indicator if the U.S. government will allow unethical companies to profit off the word ‘organic’ who violate NOP regulations” says Craig Minowa, Environmental Scientist for the OCA. “It is crucial the USDA stop this scheme to count tap water as an organic ingredient, in order to have meaningful organic labeling standards for food products and personal care products.”

The organic water scheme enables Bayliss Ranch's customers--manufacturers of body care and food products for consumers--to make fraudulent claims about their products' being “70% organic,” by counting the ordinary water in the Bayliss extracts as the primary “organic” content of the products. This makes a mockery of the fundamental purpose of the NOP, which assures consumers that products claiming organic status are truly at least 70% organic WITHOUT counting water as “organic.”

After receiving QAI's certification under the National Organic Program for food in the summer of 2003, Bayliss Ranch commenced marketing its hydrosol water extracts for use in beverages, sauces, soups and other water-based food products as well as body care products “as the perfect base ingredient in products allowing a certified organic labeling claim.” (See Exhibit 3 of OCA's Complaint at www.organicconsumers.org/bodycare/links2.cfm).

Rutgers University Case Study Finds Most Hydrosol is Added Water

Contained in the Complaint is a study performed by the New Use Agricultural Natural Plant Products Program at Rutgers University (NUANPP; <http://www.nuanpp.org/>): Pierre Tannous, Rodolfo Juliani, Mingfu Wang and Jim Simon, *Water Balance in Hydrosol Production Via Steam Distillation: Case Study Using Lavandin (Lavandula x intermedia)*. This provides a first scientific study of the minimum theoretical contribution of water from the steam versus the plant material to a hydrosol water extract while essential oil is distilling. Even with extremely unrealistic conservative assumptions, the Rutgers study found that the minimum contribution of water from steam was at least 71%.

Currently, an increasing number of brands, such as **Avalon Natural Products**, **JASON**, and **Nature's Gate**, are misleading consumers into thinking 70% content of their products are “organic” (Note: 70% organic content enables a product to make a front panel organic label claim under the National Organic Program). All these companies are supplied organic hydrosol water extracts by a single supplier, **Bayliss Ranch**, certified by **QAI**, the largest organic certifier in the world. Similar to an infusion or tea, which is made by boiling plant material in water, hydrosol water extracts are made by steaming plants, and then cooling the steam back to water. Products made with infusions or teas cannot count the water in such teas or infusions as organic in calculating organic content under NOP food standards. However, it has become distressingly common practice to use “Steam Tea” as the main “organic” ingredient in many products by misleadingly counting the ordinary water ins such “Steam Teas” as organic.

The OCA is a grassroots nonprofit organization concerned with food safety, organic farming, sustainable agriculture, fair trade and genetic engineering.

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