

INTERNATIONAL
**Food
Additives
Council**

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October 1, 2013

Michelle Arsenault
Special Assistant
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW
Room 2648-So., Mail Stop 0268
Washington, DC 20250-0268

Re: Docket Number AMS-NOP-13-0049; NOP-13-04; Notice of Meeting of the National Organic Standards Board

Dear Ms. Arsenault,

The International Food Additives Council (IFAC) is responding to the notice published September 5, 2013 in the *Federal Register* announcing the October 2013 meeting of the National Organic Standards Board (NOSB). IFAC is an international association representing companies that produce high quality substances used worldwide as food ingredients, including food additives and GRAS substances.

IFAC supports the continued listing of gellan gum on the National List of Allowed and Prohibited Substances (National List) at Section 205.605. Gellan gum is an approved food additive regulated by the US Food and Drug Administration (FDA) at 21 CFR 172.665 where use level of GMP is specified. Gellan gum meets the FDA definition of a stabilizer and thickener and, as such, gellan gum may be used to achieve the technical and functional effects listed in the standards of identity in 21 CFR 170.3 (o)(28).

Gellan gum provides the organic industry with unique properties to formulate products for consumers across various application segments: aspics; frostings; brownies and bakery fillings; salad dressings; gelatins and puddings; water gels; nonstandardized jams and jellies; dairy drinks and soy milks; nutritional products; beverages (fruit drinks, drinking jellies, novelty drinks); yogurt, sour cream and cheese where the standards of identity do not preclude its use; yogurt fruit and fruit sauces; pourable and spoonable dressings; and dairy desserts.

- Gellan gum can be used in fortified beverages to suspend of protein, minerals, vitamins, fiber and pulp. Calcium fortified beverages (soy, rice, almond, etc.) are of great interest to the organic consumer. Gellan gum also provides milk solid suspension in diluted milk drinks.
- Gellan gum offers unique functionalities and mouthfeel; for example, partial (or total) gelatin replacement for added heat stability, acid stability, and improved process tolerance.
- Gellan gum will also provide the organic community with a non-animal gel source, suitable for vegetarians and people with religious dietary restrictions (Kosher/Halal).

For these reasons, IFAC supports the continued listing of gellan gum on the National List. Thank you for your consideration. Please contact me with questions.

Sincerely,



Haley C. Stevens, Ph.D.
Executive Director