



May 2, 2012

Docket No. AMS-NOP-12-0017; NOP-12-06
Public comments on the Handling Committee recommendations concerning
carrageenan.

The Hain Celestial Group is one of the largest producers of organic products in the world. We make a wide variety of organic products that are manufactured at many different food processing facilities located throughout the United States and other countries.

First, we wish to strongly support the handling committee's recommendation to relist carrageenan on 205.605 (a) nonsynthetics allowed.

Second, there seems to be a question as to whether carrageenan is a synthetic or nonsynthetic substance. If and when it is determined that carrageenan is a synthetic substance, as a separate action we would support the recommendation to simultaneously list carrageenan on 205.605 (b) and remove carrageenan from 205.605 (a). To avoid a major disruption in the marketplace, it is very important that the removal from 205.605 (a) does not occur until final rulemaking has added carrageenan to 205.605 (b).

Our support for relisting carrageenan is based on the following:

1. **Essential for Organic Production:** Carrageenan is a necessary ingredient in many organic and made with organic products. It is used in various applications as an emulsifier, stabilizer or thickener. Carrageenan is unique. Its unique characteristics are not matched by any other substance, and it cannot be replaced by any other substance. Carrageenan helps in creating the proper suspension and mouthfeel in beverages and frozen dessert products. We often use carrageenan in combination with other gums and emulsifiers. We have spent years developing these combinations for specific applications in organic products, and carrageenan is essential in these applications.
2. **Safety:** Carrageenan is classified as GRAS or generally recognized as safe for direct addition to food for human consumption. This is codified in 21 CFR Sec. 172.620. Carrageenan has also been determined to be safe in food by the FAO/WHO/ JECFA (Joint Evaluation Committee for Food Additives). Arguments questioning the safety of carrageenan are based on animal studies in which highly degraded carrageenan called poligeenan has been fed to animals in quantities that are not consumed by humans. There is no credible evidence that

the levels of food grade carrageenan consumed by human beings causes any ill effects on human health.

3. **Meets all criteria for addition to the national list:** Carrageenan meets all of the criteria for allowed substances as delineated in 7 CFR 205.600. It is essential for the handling of organically produced agricultural products, and there are no organic substitutes. Carrageenan is GRAS and its manufacture, use, and disposal do not have adverse effects on the environment and are done in a manner compatible with organic handling.

In conclusion, we urge the members of the National Organic Standards Board to vote yes on relisting carrageenan to 205.605 (a). We thank the Board members for all of their hard work and for considering our comments.

Sincerely,



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