

INTERNATIONAL
**Food
Additives
Council**

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May 3, 2012

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

RE: Docket Number AMS-NOP-12-0017; NOP-12-06- Notice of Meeting of National Organic Standards Board

Dear Ms. Arsenault

The International Food Additives Council (IFAC) is an international trade organization representing companies who produce high quality substances used worldwide as food additives. IFAC appreciates the opportunity to comment on the National Organic Program's April 9 "Notice of Meeting of the National Organic Standards Board," in particular on the listing of materials in Sections 205.605(a) and (b) of the National List of Allowed and Prohibited Substances (National List).

IFAC supports the continued use of all synthetic and non-synthetic substances currently allowed as ingredients in or on processed products labeled as "organic" or "made with organic." These ingredients are approved by the U.S. Food and Drug Administration and thus are deemed safe without environmental concerns. They have been evaluated previously under the National Organic Program and deemed appropriate for "organic" and "made with organic" products. If any of these substances were disallowed, the quality, number and types of "organic" and "made with organic" products available would decrease.

IFAC takes this opportunity to provide comments on specific ingredients. We have noted with interest that carrageenan, agar-agar and cellulose appear under Sunset Materials on the National Organic Standards Board (NOSB) agenda for the NOSB's May 22-25 meeting.

Carrageenan:

Carrageenan is a naturally occurring carbohydrate found in seaweed from various parts of the world. It is obtained by extraction with water, alkaline water or alcohol. As a uniquely valuable ingredient with a long history of safe use in both organic and non-organic food, manufacturers commonly rely on its broad gelling, thickening, and stabilizing properties (i.e. as a hydrocolloid). Furthermore, governments around the world have reviewed the safety of carrageenan and have each determined that carrageenans as extracted from specific species of seaweed, are safe for their intended uses in food.

We are particularly concerned with the Handling Committee's recommendation that the current listing of carrageenan on the National List, as a nonagricultural (nonorganic), non-synthetic substances allowed as an ingredient in or on processed products labeled as "organic" or "made with organic (specified ingredients or food groups(s))" (7 CFR 205.605(a)), be relisted under 205.605(b) (synthetics allowed). According to the Handling Committee, the recommendation was made based on the conclusion that alcohol and alkali extraction methods used to obtain carrageenan from seaweed "may in most instances, alter it." IFAC believes that carrageenan extraction methods do not constitute a significant change, and alkaline treated carrageenans are not structurally different from naturally occurring ones. It should also

be noted that seaweed itself performs the majority of the conversion and only a small remaining fraction, if any, is converted during alkaline treatment.

We are also concerned that reclassifying carrageenan on the National List under 205.605 (b) raises questions about consistency of allowed non-synthetics on the National List. Because several other substances extracted using hot alkali processes are currently listed at 205.605 (a) (including Dutch chocolate, pretzels and soap), we see no precedent for relisting carrageenan as synthetic. Furthermore, the carrageenan extraction process is used to increase yield, not alter the product. This is consistent with other chemicals allowed in organic production such as the use of ethylene, which is permitted in organic pineapple farming to increase yields and speed fruiting (National List 205.605 (b)).^{1,2} Due to these consistency questions, we encourage the NOSB to develop criteria to determine what constitutes a synthetic vs. non-synthetic substance, before enacting changes to substances on the National List.

Furthermore, carrageenan is a unique hydrocolloid with respect to origin, its protein interaction, and its gelling, suspension and thickening abilities. Thus, no single alternative exists to which producers could turn to ensure consistency of their food products at such broad ranges. Additionally, carrageenan has synergy with some gums in its gelling ability and texturizing ability. Many finished food producers rely on complex hydrocolloid formulations, which include carrageenan, to ensure that their products display the specific, consistent qualities their consumers demand. Carrageenan forms gels in numerous food systems, which remain stable over a wide pH range relevant to various food products. They are thermo-reversible and can be turned from hard and brittle to soft and elastic. Moreover, carrageenan has unique protein interactions e.g. dairy proteins, which are utilized in countless food products. Reclassifying or delisting carrageenan when no alternative exists could jeopardize the ability of producers to bring a consistent product to market and threaten consumer access to the products they desire.

Agar-agar:

Agar-agar is a seaweed-derived hydrocolloid that provides stability against freezing and thawing in many food applications. Agar-agar has stronger setting properties than gelatin and can serve as a substitute for gelatin to meet certain dietary needs. It can also enhance the milky property of ice cream and chocolate milk.

IFAC supports the Handling Committee recommendation that agar-agar be relisted on the National List at 205.605 (a), nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).” We also support the Handling Committee’s recommendation for an additional listing of agar-agar at 205.605 (b), synthetic substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).” Again, we encourage the NOSB to develop criteria to determine what constitutes a synthetic vs. non-synthetic substance.

Cellulose:

Cellulose is one of the most abundant organic substances on earth. Most commercially available cellulose is produced from wood pulp or other plant sources through a delignification process that results in sufficient chemical change to render the substance synthetic. Cellulose is primarily used in food applications as a filtering aid, as a component of processed meat casings, and as an anti-caking agent. While the production of non-synthetic cellulose is technically possible, no commercial sources of non-synthetic cellulose are currently known.

¹ <http://www.ocpro.ca/docs/Newsletters/Summer%202011%20Newsletter.pdf>

² <http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5067073>