

## **HANDLING COMMITTEE**

### **CARRAGEENAN**

NOC agrees with the Handling Committee's recommendation to re-classify Carrageenan as synthetic – given ample evidence presented in the TR.

NOC disagrees with the Handling Committee recommendation to continue the allowance of synthetic carrageenan and re-list carrageenan on the National List, now at §205.605(b). It is clear from many reviews of Carrageenan that there are alternative materials that currently exist, serve the same function, and are currently being used in identical products. In addition, there is significant research to suggest that the consumption of Carrageenan in products may have adverse effects on human health, and there are adverse environmental impacts in both its over-harvesting, and production (alkaline) waste products.

Unfortunately, the Handling Committee recommendation does not address the significant health effects, referring only to allowance by FDA. We reiterate an oft-repeated statement of NOC that allowance by another federal agency of any substance or material being examined by NOSB in no way should confer safety, health, or environmental sufficiency required by OFPA evaluation.

For an in-depth (and well-documented) discussion of the health effects, including the presence of carcinogenic degraded carrageenan in food-grade carrageenan, we refer you to comments by the Cornucopia Institute. For a discussion as to environmental impacts, we refer you to the comments of Beyond Pesticides.

### **GIBBERELIC ACID**

NOC urges the NOSB to wholly reject the petition for listing gibberellic acid for a postharvest use.

- NOC agrees with the Handling Committee's findings that gibberellic acid should not be allowed for postharvest use on citrus, based on information that the material reduces the nutritional content of citrus fruit.
- NOC agrees with the Handling Committee that the petition does not make an adequate case for the need for gibberellic acid for postharvest use on pineapples.
- NOC *does not agree* with the recommendation by the Handling Committee that supports use of gibberellic acid for postharvest handling of bananas, for the reasons described below.

We base our opinion about the postharvest use of gibberellic acid on bananas on information contained in the comments of Organically Grown Company (OGC). OGC polled farmers who produced millions of pounds of organic bananas for sale in the US and learned that the farmers currently employ cultural practices, such as managing soil