

Carrageenan – WDA supports the Committee’s recommendation to continue the allowance of carrageenan in products labeled “organic” and “made with organic” with the change in classification of carrageenan from a nonsynthetic to an allowed synthetic on 205.605(b). In light of the information that there are two forms of carrageenan: high-molecular weight that is referred to as “food grade” and listed as GRAS, and poligeenan: low-molecular weight (degraded carrageenan) with a known adverse toxicological profile, the NOSB should include an annotation that restricts carrageenan to food grade only (CAS # 9000-07-1). WDA also agrees that the listing of this material should be revisited when a final guidance document on the Classification of Material is completed. We find that the body of scientific research, provided in the Technical Evaluation Report and in JECFA (FAO/WHO Joint Expert Committee on Food Additives) reports, as well as the historic use of carrageenan to be sufficient evidence that the use of food grade carrageenan is not harmful to human health.

Sincerely,

Bill Wolf, Katherine DiMatteo and Sandy Mays
Partners

The partners and associates of Wolf, DiMatteo + Associates have over 100 years of combined experience in the organic sector. We have served hundreds of farms and businesses with their organic production systems and regulatory compliance, both nationally and internationally. We have been involved in the founding of several key organic organizations including the Organic Trade Association, Organic Materials Review Institute and the Organic Center. We are fiercely committed to continual improvement and to provide our clients and the organic sector with the tools to advance organic, environmental, and social practices.