

CELLULOSE

EXECUTIVE SUMMARY

Cornucopia cannot support the relisting of cellulose on 205.605(b) without a new Technical Review that bridges the 11-year gap between 2001, when the original TR was performed, and the present day.

- The original Technical Review, performed by **OMRI** in 2001, found **microcrystalline cellulose** to be a “**highly processed material not compatible with organic handling systems,**” and the reviewers unanimously suggested that microcrystalline cellulose be **prohibited** in 95% organic foods.
- The 2001 TR pointed out **environmental concerns** with the production of microcrystalline cellulose: “acid wastes due to the use of hydrochloric and other acids” (Hanna, 2001).
- The 2001 TR also pointed out that cellulose is **prohibited in IFOAM, Codex, EU and Canadian organic standards.**

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Cornucopia cannot support the relisting of cellulose on 205.605(b) without a new Technical Review that bridges the 11-year gap between 2001, when the original TR was performed, and the present day.

It is unclear what information was used by the Handling Committee when it made the following statement in its proposal: “There is no new information contradicting the original recommendation which was the basis for the previous NOSB decisions to list and again re-list this material.”

Without a current Technical Review, how did the Handling Committee (HC) come to the conclusion that there is “no new information”? If members of the HC performed their own technical and scientific review, a more comprehensive summary of their findings, including references of publications and documents that were reviewed, should be included in their proposal.

If the NOSB were to vote on cellulose at the meeting in Albuquerque, the following must be added to the annotation: “microcrystalline cellulose is prohibited.”

It appears that the original Technical Review, performed by OMRI in 2001, concluded the following about microcrystalline cellulose, which was part of the petition:

“All reviewers considered microcrystalline cellulose to be a highly processed material not compatible with organic handling systems (TR 22).”

As a result, the 2001 TR’s reviewers unanimously suggested that microcrystalline cellulose be prohibited in 95% organic foods (TR 59). However, the current listing for cellulose on 205.605(b) does not appear to prohibit microcrystalline cellulose, as the TR suggested.

According to the minutes of the 2001 NOSB meeting, the Board voted for the current annotation: “for use in regenerative casings, as an anti-caking agent (non-chlorine bleached) and filtering aid.” Microcrystalline cellulose can be made without bleaching (Hanna 1998) and is used as an anti-caking agent, and is therefore not prohibited by the current annotation.

It appears that the Handling Committee used the 2001 TR as justification for its proposal to relist cellulose with the current annotation. And yet the 2001 TR’s conclusions, which propose to prohibit microcrystalline cellulose, and the current listing, which allows microcrystalline cellulose, are incompatible.

If a current TR were available, it would likely echo the environmental concerns with microcrystalline cellulose that were noted in the 2001 TR:

“Conventional production of microcrystalline cellulose results in production of acid wastes due to the use of hydrochloric and other acids (Hanna, 2001).”

The 2001, the TR (line 273) also points out that cellulose is prohibited in the following international organic standards:

CODEX – Not listed. Microcrystalline cellulose was proposed by a member country prior to the May 2001 meeting, but was not adopted.

EU 2092/91 – Not listed.

IFOAM – Not listed. (IFOAM IBS 2000)

Canada – (1999). Not listed in Appendix C, Permitted Substances for Processing.

International - Uses of anti-caking agents in cheese products appears to be prohibited in Belgium, Canada, Denmark, Finland, France, Italy, Japan, Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, UK, and West Germany (Branen, 1990).

In summary, the three reviewers in the 2001 TR unanimously concluded that microcrystalline cellulose should be prohibited, and pointed out that alternatives exist to microcrystalline cellulose (silicon dioxide, for example). Their concerns and

proposal appear to have been ignored by the Board in 2001, and appear to be ignored by the current Handling Committee which proposes to relist cellulose without an annotation change.

The sunset vote for cellulose should be delayed until a new Technical Review has been completed, and its concerns are taken seriously. Concerns that were noted in the original TR, such as the prohibition of microcrystalline cellulose, are likely to be noted in the new TR and should be taken seriously by the Board.

Most importantly, a new TR is the only way to find out whether new information exists regarding the material's compatibility with principles of organic production and handling.