



May 1, 2012

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National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.
Room 2648-So., Mail Stop 0268
Washington, DC 20250-0268

RE: Comments for the May 22-25, 2012 Public Meeting of the NOSB

The Soyfoods Association of North America (SANA) would like to urge the United States Department of Agriculture, Agricultural Marketing Service (AMS) and the National Organic Standards Board (NOSB) re-list calcium sulfate and glucono delta lactone (GDL) as nonagricultural (nonorganic) substance ingredients allowed in processed products labeled “organic.” SANA represents the interests of small and large soyfood manufacturers, soy processors, ingredient suppliers, soybean farmers, and other industry stakeholders.

Calcium sulfate and glucono delta lactone (GDL) are very important ingredients in the manufacturing process of organic tofu. Calcium sulfate, used in tofu manufacturing for centuries, is a coagulant that yields specific textural qualities of tofu that cannot be duplicated by any other coagulant. This domestically-produced, naturally mined earth mineral also provides a natural source of calcium for consumers who eat tofu. Glucono Delta Lactone (GDL) is also a tofu coagulant prepared by direct crystallization from the aqueous solution of gluconic acid, which is produced by the oxidation of D-glucose. When GDL is used along with other coagulants such as calcium chloride, Calcium Sulfate, or Magnesium Chloride, these salts act to coagulate soymilk into a “silken” smooth tofu.

SANA appreciates the opportunity for its member companies and other stakeholders to comment on the classification of these important ingredients. SANA wishes to thank the NOSB Handling Committee for its thoughtful consideration and re-affirmation of the November 2007 recommendation for re-listing calcium sulfate and GDL on the approved list of ingredients for organic products, as no unacceptable risks to the environment, human or animal health as a result of the use or manufacture of these ingredients were found.

SANA appreciates the NOSB’s continued support of the organic industry and careful consideration of the needs of soyfoods manufacturers.

Best regards,

Nancy Chapman, RD, MPH
Executive Director