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October 2, 2015

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

Re. HS: Reclassification of alginic acid

These comments to the National Organic Standards Board (NOSB) on its Fall 2015 agenda are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

Alginic acid is synthetic

Beyond Pesticides supports the reclassification of alginic acid as synthetic. We agree that application of the draft NOP classification guidelines supports a classification of alginic acid because the salts and not the acids occur naturally in seaweeds.

However, we disagree that alginic acid should be listed on §205.605(b) for the reasons given below.

Alginic acid is used for prohibited purposes.

The 2015 Technical Review (TR) says, "Alginic acid is primarily used to improve textures in soups and soup mixes as an emulsifier, formulation aid, stabilizer and thickener. The use of alginic acid for these purposes is not a response to flavors, colors, textures or nutritive values lost in processing, but is used instead to improve textures of soup and soup mixes as sold."[1] Is it better to provide an artificial texture? We believe that purpose is not consistent with consumer expectation of organic products.

[1] Lines 336-339.

The manufacture of alginic acid results in environmental damage.

The TR of Alginic Acid raises other pertinent issues. Although most brown seaweed species used for alginic acid are wild-harvested, some are cultivated, and the cultivation raises issues associated with increased sediment deposits, depletion of nutrients, possible impacts of nutrients added (organic and synthetic sources of nitrogen), and the introduction of non-native species.[2]

In addition, although brown algae itself recovers from intensive harvesting,[3] harvesting can have significant impacts on other members of the ecosystem.[4] A Food and Agriculture Organization technical report says, "Waste waters from filtration are alkaline, they contain calcium from the calcium precipitation (excess calcium gives a more fibrous calcium alginate) and acid from the acid conversion step. In some countries the waste is pumped out to sea. Where environmental concerns are greater, or when water supplies are limited, recycling is not too difficult and its costs may be partly offset by the lowering of the quantity and cost of water used by the factory. A means of disposing of solid wastes –the seaweed residue and used filter aid - must be found."[5] Heavy metals and radioactivity are concentrated by brown algae and therefore may be part of the waste stream.[6]

Alginic acid is not necessary for organic handling.

The use of a synthetic material to improve textures in soups and soup mixes is a purpose that is not essential to the production of food. Furthermore, the TR lists many natural and organic substitutes.[7]

Conclusion

The NOSB should classify alginic acid as synthetic and remove it from the National List.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors

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[2] Lines 386-399.

[3] Rothman, M. D., Anderson, R. J., & Smit, A. J. (2006). The effects of harvesting of the South African kelp (Ecklonia maxima) on kelp population structure, growth rate and recruitment. *Journal of applied phycology*, *18*(3-5), 335-341.

[4] Lorentsen, S. H., Sjøtun, K., & Grémillet, D. (2010). Multi-trophic consequences of kelp harvest. *Biological Conservation*, *143*(9), 2054-2062.

[5] D.J. McHugh, 2003. A Guide to the Seaweed Industry. FAO Fisheries Technical Paper 441.

[6] David A. Roberts, Emma L. Johnston, Alistair G.B. Poore, 2008. Contamination of marine biogenic habitats and effects upon associated epifauna. Marine Pollution Bulletin 56:1057–1065. Daiichi Weiss, D. (2011). Contamination of water, sediments and biota of the Northern Pacific coastal area in the vicinity of the Fukushima NPP. In *Paris, France, November: EUROSAFE Forum*.

[7] Lines 425-458.