



BEYOND PESTICIDES

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September 20, 2013

National Organic Standards Board
Fall 2013 Meeting
Louisville, KY

Re. HS: Sunset for Gellan Gum

These comments are submitted on behalf of Beyond Pesticides. 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, 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 groups around the world.

Beyond Pesticides opposes the relisting of gellan gum on §205.605a. Gellan gum is synthetic and should have been considered for listing on §205.605(b). Furthermore, under the new sunset policy announced by the NOP, unless the Handling Subcommittee proposes not to relist gellan gum, it will not be reviewed and considered by the full board as required by OFPA, and would be acting without adequate transparency and public input.

Gellan gum was originally petitioned as a synthetic for listing on §205.605(b). The 2008 NOSB recommendation includes transcript excerpts in which the NOSB made the decision to list it as a nonsynthetic, in spite of information in the technical review (TR). The TR (lines 109-112) states,

The thickness and hardness of the gellan gum is determined by acetyl groups present in the gellan gum obtained from the microbial culture. With acetyl groups present, the gel is soft and elastic. Firmer gels are obtained by removing the acetyl groups to some extent by adding potassium, magnesium, calcium, and/or sodium salts).

While it is possible that these mineral salts are nonsynthetic, there is no indication that they are. The removal of the acetyl groups is a chemical change, and it is not accomplished by natural processes. In addition, gellan gum contains a small quantity of isopropyl alcohol used in the extraction process. This, along with the mineral salts and their reaction products, is an ancillary ingredient that must be taken into account in the review of gellan gum.

Finally, the NOP announcement concerning sunset allows for only one kind of recommendation to come out of the subcommittee – a recommendation against relisting the sunset substance. Even if the subcommittee believes that gellan gum should be relisted, it does not have the authority to act on behalf of the full board. If it does not propose not to relist gellan gum, it

would be acting without adequate transparency and public input. Therefore, the Handling Subcommittee must propose that it not be relisted.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a prominent initial "T" and a long, sweeping underline.

Terry Shistar, Ph.D.
Board of Directors