



BEYOND PESTICIDES

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April 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: Triethyl Citrate

These comments to the National Organic Standards Board (NOSB) on its Spring 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 groups around the world.

We agree with the Handling Subcommittee (HS) recommendation to deny the petition to list triethyl citrate on §205.605(b) because it does not meet the OFPA criteria of absence of impacts on human health and the environment, essentiality, and compatibility with organic handling.

Triethyl citrate is synthetic.

We agree with the HS that triethyl is synthetic because it is formed by a chemical reaction that does not occur in nature.

The manufacture of triethyl citrate poses hazards to human health and the environment.

Triethyl citrate is formed by reacting citric acid with ethanol under certain conditions. Both citric acid and ethanol may be made by fermentation processes. Citric acid fermentation may use genetically engineered organisms as a substrate, and ethanol production usually does. Nonorganic ethanol production generally relies on a substrate of corn grown in a chemical-intensive system, and thus involves heavy use of irrigation water, pesticides, and fertilizers, as well as genetically engineered organisms.

Triethyl citrate is not essential.

As pointed out by the HS and the technical review, there are several nonsynthetic alternative egg white stabilizers, including some that are available as organic products: sugar, salt, xanthan

gum, and guar gum. In addition, potassium acid tartrate (cream of tartar), which is on the National List on §205.605(b), has a long history of use for the purpose.

Triethyl citrate is incompatible with organic handling.

§205.600 (b)(4) establishes as a criterion for listing a synthetic material added to organic food or used as a processing aid:

(4) The substance's primary use is not as a preservative or to recreate or improve flavors, colors, textures, or nutritive value lost during processing, except where the replacement of nutrients is required by law;

The primary use of triethyl citrate is to recreate textures and related properties that are lost during pasteurization. Thus, triethyl citrate is incompatible with organic processing.

Conclusion

The petition to list triethyl citrate on §205.605(b) should be denied because it does not meet the OFPA criteria of absence of impacts on human health and the environment, essentiality, and compatibility with organic handling.

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors