



September 27, 2013

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

RE: Notice of Meeting of the National Organic Standards Board
[Docket Number: AMS-NOP-13-0049; NOP-13-04]

Dear Ms. Arsenault:

The Juice Products Association (JPA) is a trade association whose international membership consists of major processors and distributors of a wide variety of fruit and vegetable juices, juice beverages, drinks, jams, jellies, fruit spreads and other fruit products. Our members represent a significant majority of the juice and juice beverage processors in the United States. Our detailed comments follow regarding the September 5, 2013 *Federal Register* (78 FR 54617) notice announcing the October 2013 meeting of the National Organic Standards Board (NOSB).

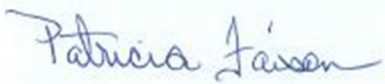
In July 2009, JPA submitted a letter to the United States Department of Agriculture (USDA) recommending that the National List of Allowed and Prohibited Substances (the National List) be revised to include gellan gum in Section 205.605, Nonagricultural (Nonorganic) Substances Allowed as Ingredients in or on Processed Products Labeled as "Organic" or "Made with Organic (Specified Ingredients or Food Group(s))."

JPA is recommending that gellan gum be maintained on the National List for use in organic beverages. The Food and Drug Administration (FDA) has approved the use of this food additive as a stabilizer and thickener in the Code of Federal Regulations (21 CFR 172.665). In the *Federal Register* notice of June 3, 2009 (74 FR 26591), it was noted that gellan gum may be used as a thickening agent in jams and jellies, bakery products, confections, dairy products, frostings and other products. Gellan gum is also used as a thickener in some beverages.

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We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "Patricia Faison". The signature is written in a cursive style and is set against a light blue rectangular background.

Patricia Faison
Technical Director