



A HUBER COMPANY

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Docket No. AMS-NOP-12-0017; NOP-12-06  
Public comments to the Handling Committee - **Carrageenan**.

CP Kelco respectfully submits comments to the National Organic Standards Board and the USDA National Organic Program regarding The Handling Committee consideration of Carrageenan and the Sunset review process.

CP Kelco produces carrageenan which is listed at 7 CFR 205.605 (a) nonsynthetic. We are a member of Marinalg, the Seaweed Producers Industry Group and IFAC (International Food Additives Council) who along with other industry associates are presenting comments to the NOSB, NOP and the public to support relisting carrageenan at 205.605 (a) nonsynthetic.

Carrageenan<sup>1</sup> is the name for a naturally occurring substance found in seaweed. The US FDA recognizes carrageenan as GRAS (21 CFR 172.620) and The FAO/WHO/ JECFA (Joint Evaluation Committee for Food Additives) has evaluated safety and toxicology studies and recognizes carrageenan as safe. Both organizations are focused on safety and find carrageenan safe for use in foods.

Carrageenan has unique functionality and can be used singly or in combination with other food additives to provide specific, unique functionality as a stabilizer, thickener and emulsifier in a wide variety of food and beverage applications by producers of organic certified products. There are many uses where carrageenan cannot be replaced by another material.

We respectfully ask that any decisions on synthetic vs non-synthetic be postponed until after the NOSB has adopted the policy for defining nonsynthetics and that when adopted all substances be reviewed at the same time, under the same criteria and with opportunity for public comment.

We support the Handling Committee's recommendation is to relist carrageenan on 205.605 (a) nonsynthetics allowed.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cheryl A. Van Dyne".

Cheryl A. Van Dyne  
Director, Global Regulatory Affairs

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<sup>1</sup> We ask that it be noted that the food additive Carrageenan is NOT poligeenan.