

Texture Innovation Center
10552 Philadelphia Road | White Marsh, MD 21162 USA
(800) 899-3953 | (410) 273-7300 | (410) 335-4935 Fax
Operations
4609 Richlynn Drive | Belcamp, MD 21017 USA
(800) 221-3953 | (410) 273-7300 | (410) 273-0289 Fax
ticgums.com



May 3, 2012

RE: AMS-NOP-12-0017; NOP-12-06 – sunset review Carrageenan

To: National Organic Standard Board Handling committee

We hereby submit comments to support the continued approval of Carrageenan in organic certified products.

At TIC Gums, we provide customers a wide variety of texture and stabilization solutions. We take pride in the fact that we offer customers many different hydrocolloids and hydrocolloid blends to meet their needs. We have found that Carrageenan offers unique suspension and gelling properties that other ingredients cannot provide.

Carrageenan is a unique functional ingredient for both conventional and organic certified products. Carrageenan plays a critical role in suspending cocoa in chocolate milk. Without Carrageenan the chocolate milk will not stay in suspension and the chocolate will separate throughout the shelf life of the product. In milk applications the maximum usage level of Carrageenan is typically 0.5 % by weight of the finished product. According to USDA statistics, the average person eats 1.6 lbs of dairy products per day¹. If all dairy products consumed were milk products that contained Carrageenan, the daily diet from dairy products would only contain 0.17 % Carrageenan. In refrigerated and aseptically processed chocolate milks including dairy, rice, soy and almond milk, Carrageenan is the only technical solution currently available, which facilitates the suspension of cocoa in chocolate milk applications.

Carrageenan is also widely used in cook-up puddings, instant puddings, sauces that contain dairy ingredients and gel-cup desserts. Carrageenan provides the texture that is essential to these types of applications.

Carrageenan has global acceptance as a GRAS food additive with widespread use. It is approved for use by the FDA according to 21 CFR 172.690. We ask that you please take this information into consideration and that Carrageenan be retained on the national list.

Kind regards,

M. Blair Brown
Regulatory Specialist
TIC Gums

¹ The US Dept. Of Agriculture estimates that the average person in the United States eats .5 lbs of meat, 1.6 lbs of dairy products, .2 lbs of fats and oils, .8 lbs of fruits, .7 lbs. Of vegetables, .5 lbs of grains, and .4 lbs of sugars per day for a total of 4.7 lbs. of food per day. To see the USDA study, follow this link:
<http://www.usda.gov/factbook/chapter1.htm>

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