



320 E South PO Box 80 Cerro Gordo, IL 61818-0080
217.763.2861 800.252.1638 Fax 217.763.2111
info@clarksongrain.com www.clarksongrain.com

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Monday, October 02, 2006

To: National Organic Standards Board
Via: Valerie Francis, Executive Director

From: Lynn Clarkson, Managing Director, Clarkson Soy Products, LLC
Processor and supplier of **100% certified organic soy lecithin**

Re: Update on production and commercial availability of organic lecithin
Comment regarding listed products under Section 205.606 to be discussed
at October meeting

Dear NOSB:

Lecithin is commonly used as an emulsifier; release agent, dispersing, wetting and instantizing agent; a fat replacer; an antioxidant; and a nutraceutical. It is extracted from an agricultural product as a fluid. Other forms of lecithin are just modifications of the basic fluid lecithin.

Five years ago, certified organic lecithin was not available. Today, the forms of lecithin most commonly used are available under organic certification. Other forms will be commercialized as demand emerges. Organic emulsifiers are evolving and should be used whenever reasonably available in terms of quality and quantity. If companies want the benefits of selling certified organic products, then they need to comply with the requirements of Section 205.606. Clarkson Soy encourages the NOSB to appropriately list/de-list ingredients and then rely on the inspectors, certifiers and NOP to require or waive use based on proof that the ag based product works/does not work in a specific application. That offers a reasonable path not only to respect the rules and consumer expectations but also to encourage development of more organic ingredients.

There are only a few forms of lecithin – fluid, bleached, powdered (typically de-oiled with a chemical such as hexane) and chemically modified. **Fluid lecithin:** Eighty to ninety percent of all lecithin used today falls into the category of fluid lecithin. That product is available with 100% organic certification. For at least three years, organic fluid lecithin has been successfully used in baby food, chocolate, baked foods, power bars, beverages, cosmetics, nutraceutical and general food processing applications. Suppliers of conventional lecithin make many standardized versions by adjusting viscosity to client requests. Such formulations are now available under organic certification. **Bleached lecithin:** Bleached lecithin probably represents less than 5% of all lecithin being used today. While an organic version could be available now, there has been no serious commercial demand for it. If commercial demand for such a product presents itself, Clarkson Soy will offer either a bleached organic lecithin or, preferably, a “light, organic lecithin” with the same characteristics as bleached lecithin but without the bleaching. **Powdered lecithin:** It is likely that many requests for powdered lecithin can be met with organic versions. Clarkson Soy is experimenting with various formulations. Another company is offering an organically certified rice based product that provides the functionality of powdered lecithin in some but not all applications. **Chemically modified lecithin:** There are a few specialty applications that use chemically modified lecithin. While there is the possibility that some of these applications could be met with organic versions, it would be inaccurate to suggest that organic versions could duplicate each and every current formulation.

Clarkson Soy Products commercially supplies organic soy lecithin in drums, pails and small buckets. It has operated for at least three years and has not yet turned down an order. It is expanding process capacity to meet growing and potential demand.

The evolution of certified organic ingredients confronts two arguments that the NOSB and NOP must reasonably balance.

- “The organic ingredient available does not meet my specifications.”
- “There is not enough organic ingredient to meet my needs.”

Conceptually, either might be correct. However, these arguments often mask the commercial goal of selling conventional, even “genetically engineered”, ingredients at an “organic” price. Too many suppliers and processors want to sell “less for more”. Too many suppliers favor “over-specifying” as a strategy to avoid the requirements of 205.606.

I do not encourage the NOSB and the NOP to draw their regulatory lines in black and white or to push anyone into using an organic ingredient that does not work well. I suggest that you continue to work with certifiers and inspectors to exercise reasoned judgment in certifying or denying certification to those continuing to use conventional lecithin in products being certified organic. Anyone using a fluid lecithin today should be using an organic lecithin.

A growing number of companies ranging from large to small are continuing to place repeat orders for certified organic lecithin in full compliance with the spirit and rules of the organic community. Clarkson Soy wishes to compliment those companies for respecting the values of the organic consumer.

Should you have questions, please contact me.

Respectfully submitted,

Lynn Clarkson

Lynn Clarkson
Managing Director, Clarkson Soy Products, LLC
Lynn.clarkson@clarksongrain.com