

# NOSB COMMITTEE RECOMMENDATION

Form NOPLIST1. Committee Transmittal to NOSB

For NOSB Meeting: May 2008

Substance: Tragacanth Gum

Committee: Crops  Livestock  Handling  Petition is for: Inclusion of Tragacanth on the National List § 205.606 (b)

A. Evaluation Criteria (Applicability noted for each category; Documentation attached)	<u>Criteria Satisfied? (see B below)</u>
1. Impact on Humans and Environment	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2. Essential & Availability Criteria	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
3. Compatibility & Consistency	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4. Commercial Supply is Fragile or Potentially Unavailable as Organic (only for 606)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

B. Substance Fails Criteria Category: \_\_\_\_\_ Comments: \_\_\_\_\_

C. Proposed Annotation (if any): water extracted only ( current annotation for this section).

Basis for annotation: To meet criteria above: \_\_\_\_\_ Other regulatory criteria: \_\_\_\_\_ Citation: \_\_\_\_\_

Recommended Committee Action & Vote (State Actual Motion): For inclusion of Tragacanth Gum § 205.606 (b) of the National List

Motion by: Julie Weisman Seconded: Steve DeMuri Yes: 6 No: 0 Absent: 0 Abstain: 0

Crops		Agricultural	<input checked="" type="checkbox"/>	Allowed <sup>1</sup>	<input checked="" type="checkbox"/>
Livestock		Non-Synthetic		Prohibited <sup>2</sup>	
Handling	<input checked="" type="checkbox"/>	Synthetic		Rejected <sup>3</sup>	
No restriction		Commercially Un-Available as Organic <sup>1</sup>	<input checked="" type="checkbox"/>	Deferred <sup>4</sup>	

1) Substance voted to be added as "allowed" on National List to § 205.606 (b) with Annotation (if any) Water-extracted only ( current annotation for this section )

2) Substance to be added as "prohibited" on National List to § 205. \_\_\_\_\_ with Annotation (if any) \_\_\_\_\_

Describe why a prohibited substance: \_\_\_\_\_

3) Substance was rejected by vote for amending National List to § 205. \_\_\_\_\_ Describe why material was rejected: \_\_\_\_\_

4) Substance was recommended to be deferred because \_\_\_\_\_

\_\_\_\_\_ If follow-up needed, who will

follow up \_\_\_\_\_

E. Approved by Committee Chair to transmit to NOSB:

Julie Weisman  
Committee Chair

March 27, 2008  
Date

**NOSB EVALUATION CRITERIA FOR SUBSTANCES ADDED TO THE NATIONAL LIST**

**Category 1. Adverse impacts on humans or the environment?**      Substance - Tragaganth Gum

Question	Yes	No	N/A <sup>1</sup>	Documentation (TAP; petition; regulatory agency; other)
1. Are there adverse effects on environment from manufacture, use, or disposal? [§205.600 b.2]			<b>X</b>	This is an agricultural product.
2. Is there environmental contamination during manufacture, use, misuse, or disposal? [§6518 m.3]			<b>X</b>	This is an agricultural product.
3. Is the substance harmful to the environment? [§6517c(1)(A)(i);6517(c)(2)(A)i]		<b>X</b>		
4. Does the substance contain List 1, 2, or 3 inerts? [§6517 c (1)(B)(ii); 205.601(m)2]		<b>X</b>		
5. Is there potential for detrimental chemical interaction with other materials used? [§6518 m.1]		<b>X</b>		
6. Are there adverse biological and chemical interactions in agro-ecosystem? [§6518 m.5]			<b>X</b>	This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem.
7. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§6518 m.5]			<b>X</b>	This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem.
8. Is there a toxic or other adverse action of the material or its breakdown products? [§6518 m.2]			<b>X</b>	This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem.
9. Is there undesirable persistence or concentration of the material or breakdown products in environment?[§6518 m.2]			<b>X</b>	This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem.
10. Is there any harmful effect on human health? [§6517 c (1)(A)(i) ; 6517 c(2)(A)i; §6518 m.4]		<b>X</b>		Tragaganth Gum is considered GRAS by the FDA (CFR 21 § 182.10)
11. Is there an adverse effect on human health as defined by applicable Federal regulations? [205.600 b.3]		<b>X</b>		
12. Is the substance GRAS when used according to FDA's good manufacturing practices? [§205.600 b.5]	<b>X</b>			See # 10 above.
13. Does the substance contain residues of heavy metals or other contaminants in excess of FDA tolerances? [§205.600 b.5]		<b>X</b>		

<sup>1</sup>If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

**Category 2. Is the Substance Essential for Organic Production? Substance - Tragaganth Gum**

Question	Yes	No	N/A <sup>1</sup>	Documentation (TAP; petition; regulatory agency; other)
1. Is the substance formulated or manufactured by a chemical process? [6502 (21)]			X	This is an agricultural product.
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]			X	This is an agricultural product.
3. Is the substance created by naturally occurring biological processes? [6502 (21)]	X			Petition p.2 #5 states “ the gum naturally exudes during harvest season through openings in the plants bark as a means of protection.”
4. Is there a natural source of the substance? [§205.600 b.1]			X	Petitioned substance is from a natural source.
5. Is there an organic substitute? [§205.600 b.1]		X		Petition p.3 #11 describes that organic locust bean, arabic and guar gums are available but these do not hold up as well as petitioned material under certain temperatures and Ph levels.
6. Is the substance essential for handling of organically produced agricultural products? [§205.600 b.6]			X	
7. Is there a wholly natural substitute product? [§6517 c (1)(A)(ii)]			X	Petitioned material is wholly natural.
8. Is the substance used in handling, not synthetic, but not organically produced? [§6517 c (1)(B)(iii)]	X			
9. Is there any alternative substances? [§6518 m.6]			X	
10. Is there another practice that would make the substance unnecessary? [§6518 m.6]			X	

<sup>1</sup>If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

**Category 3. Is the substance compatible with organic production practices? Tragaganth Gum Extract**

Question	Yes	No	N/A <sup>1</sup>	Documentation (TAP; petition; regulatory agency; other)
1. Is the substance compatible with organic handling? [§205.600 b.2]	X			Attachment # 2 is an article describing the cultivation, harvest and processing of gum tragacanth as being identical to gum Arabic, which is already included on the National List § 205.606.
2. Is the substance consistent with organic farming and handling? [§6517 c (1)(A)(iii); 6517 c (2)(A)(ii)]	X			
3. Is the substance compatible with a system of sustainable agriculture? [§6518 m.7]			X	
4. Is the nutritional quality of the food maintained with the substance? [§205.600 b.3]	X			
5. Is the primary use as a preservative? [§205.600 b.4]		X		
6. Is the primary use to recreate or improve flavors, colors, textures, or nutritive values lost in processing (except when required by law, e.g., vitamin D in milk)? [205.600 b.4]		XX		Used to create textures in processed products to meet consumer expectations of those types of products, not to restore texture lost during processing.
7. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:			X	
a. copper and sulfur compounds;			X	
b. toxins derived from bacteria;			X	
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?			X	
d. livestock parasiticides and medicines?			X	
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?			X	

<sup>1</sup>If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

**Category 4. Is the commercial supply of an agricultural substance as organic, fragile or potentially unavailable?** [§6610, 6518, 6519, 205.2, 205.105 (d), 205.600 (c) 205.2, 205.105 (d), 205.600 (c)] Tragacanth Gum

Question	Yes	No	N/A	Comments on Information Provided (sufficient, plausible, reasonable, thorough, complete, unknown)
1. Is the comparative description provided as to why the non-organic form of the material /substance is necessary for use in organic handling?	XX			Petition p. 3 #11 describes that other gums are available in organic form but these do not hold up as well as petitioned material under certain temperatures and Ph levels required for the production of the sauces and dressing made by the petitioner.
2. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate <b>form</b> to fulfill an essential function in a system of organic handling?	XX			See #1 above.
3. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate <b>quality</b> to fulfill an essential function in a system of organic handling?		X		
4. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate <b>quantity</b> to fulfill an essential function in a system of organic handling?		X		
5. Does the industry information provided on material / substance non-availability as organic, include ( but not limited to) the following: a. Regions of production (including factors such as climate and number of regions);	XX			Petition p. 4 "Justification Statement" describes that" although [gum tragacanth] is capable of being produced by organic methods it is not currently being cultivated under organic certification....Nearly all the gum tragacanth produced in the world comes from Iran and neighboring countries."  The petitioner states that the non-organic gum tragacanth they currently use comes from Turkey and that the amount of organic agriculture taking place in Turkey is increasing. The petitioner states that Turkey is capable of providing a supply of organic gum tragacanth and that they (the petitioner) are actively seeking such a supply.
b. Number of suppliers and amount produced;	XX			Petition p. 4 "Justification Statement" names two suppliers of gums. One, TIC Gums choses not to sell Tragacanth gum at all, the other, Gumix International can only obtain Tragacanth gum in non-organic form.
c. Current and historical supplies related to weather events such as hurricanes, floods, and droughts that may temporarily halt production or destroy crops or supplies;		XX		Petitioner does not indicate that weather events are a factor affecting the supply of Tragacanth gum in organic form.
d. Trade-related issues such as evidence of hoarding, war, trade barriers, or civil unrest that may temporarily restrict supplies; or	XX			Petition p. 4 "Justification Statement" describes that "the United States has trade embargoes in place with Iran and other Middle Eastern countries which limits.... the trade of non-organic gum tragacanth, let alone an organic form."
e. Are there other issues which may present a challenge to a consistent supply?				