

**National Organic Standards Board**  
**Handling Committee Recommendation for §205.605(b)**  
*Sunset of Tetrasodium Pyrophosphate*

September 9, 2009

**I. List:**

**National Organic Program Subpart G: The National List of Allowed and Prohibited Substances. §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)).”**

*(b) Synthetics allowed*

**II. Committee Summary:**

Tetrasodium pyrophosphate (TSPP) was added to the National List §205.605(b) effective on September 12, 2006 by Final Rule TM-04-01FR based on the NOSB recommendation of April 2004. It carries the annotation “for use only in meat analog products”.

Tetrasodium pyrophosphate (CAS # 7722-88-5) was originally petitioned for use as a pH buffer and dough conditioner for use in organic meat alternative products. It is a relatively common GRAS food additive with USDA and FDA approval for many functions in conventional foods, as an emulsifier, buffer, nutrient, dietary supplement, sequestrant, and texturizer. According to the TAP review, dated July 29, 2002, TSPP is prepared by molecular dehydration of dibasic sodium phosphate at 500 degrees C. Relatively minor negative environmental impact from manufacture and use is usually associated with its application in the detergent industry, not from its food uses. TSPP has been linked to kidney damage in rat studies, but most of the literature cited in the TAP referred to health effects related to its medical, not food, uses, and reviewers did not convey concern over its health effects on humans.

All reviewers agreed that the substance is a synthetic. One recommended it be listed on the National List for the petitioned use, with limits as per Good Manufacturing Practices, but two reviewers were of the opinion it should not be listed. It passed a full NOSB vote for listing in April 2004, 10 yes, 3 no, and 1 absent.

The NOSB has received three public comments in support of, and no public comments opposed to, the relisting of Tetrasodium pyrophosphate in response to the Federal register notice of the sunset of Tetrasodium pyrophosphate (AMS-TM-07-0136). No new information has been brought forward or discovered that causes the Handling Committee to recommend against the relisting of this substance.

**III. Committee Recommendations**

The Handling Committee recommends the continued listing of Tetrasodium pyrophosphate (CAS # 7722-88-5) – for use only in meat analog products in the National List section 206.605(b).

*Moved: Steve DeMuri                      Second: Joe Smillie*

*Committee Vote: Yes- 5      No- 0      Absent- 1      Abstain- 0      Recuse- 0*