

NOSB Recommendations

Draft Recommendation
"Guidelines for determining whether a processing technology shall be reviewed by the NOSB"
NOSB Processing Committee
December 5, 2001

Issue: OFPA's definition of processing appears to allow most, if not all, mechanical, and biological processes. However, the intent of OFPA, although broadly inclusive, was not necessarily meant to allow in organic processing all of the novel processing methods currently being used in the production of foodstuffs.

Guidelines are needed to assist processors, certifiers and others in determining whether a process that does not appear to fit into the category of allowed processes described in the definition for processing and in 205.270(a) needs to be reviewed by the NOSB to determine compatibility with organic processing. It is anticipated that specific recommendations will be made by the NOSB to the National Organic Program regarding the compatibility of reviewed processing technologies in the handling of organic ingredients and foodstuffs.

Recommendation:

Guidelines for determining what processing technologies shall be reviewed by the NOSB

- 1) Processes that are strictly mechanical or biological are allowed for processing of organic food products. Any process that does not cause a change in the food, other than by mechanical or biological means, and does not introduce nonagricultural substances, other than those allowed in §205.605, would not need to be reviewed.
- 2) Processes other than mechanical or biological processes that are primarily intended to make or break covalent chemical bonds are subject to review by the NOSB before being allowed in the processing of organic food products. (Ex. Chemical carbohydrate conversions processes)
- 3) Processes in which nonagricultural substances, other than those allowed in §205.605, are components of the materials and are introduced into the food are subject to review by the NOSB before being allowed in the processing of organic food products. The materials not allowed in §205.605 that are introduced into the food would also need to be petitioned. (Ex. Hydrogenation of oil)
- 4) Processes in which specific chemical components of the food are selectively and purposely removed during the process via a chemical process vs. a mechanical process are subject to review by the NOSB before being allowed in the processing of organic food products. (Ex. Ion Exchange)
- 5) Any other process not covered by the above listed guidelines shall be submitted for review. (Ex. UV light)"