

Handling Recommendations -- 1995

NATIONAL ORGANIC STANDARDS BOARD FINAL RECOMMENDATION ADDENDUM NUMBER 15 INCIDENTAL FOOD ADDITIVES IN ORGANIC FOODS

Date adopted: October 31, 1995
Location: Austin, Texas

Introduction:

The Food and Drug Administration's Code of Federal Regulations (CFR), Title 21, Part 170.3 (o) lists the types of ingredients that may be added to foods for the purpose of imparting physical or technical functional effects to the food. This list includes many categories of ingredients including anti-caking agents, colors and coloring adjuncts, emulsifiers, leavening agents, processing aids, stabilizers and thickeners. These food additives must be listed as ingredients on food product labels unless exempted from the labeling requirements in 21 CFR,

Part 101.100. 21 CFR, Part 101.100 (a)(3) describes incidental food additives that are exempt from food labeling requirements and do not need to be listed in the ingredient statement of food product labels. Incidental food additives are present in food in insignificant levels and do not have any technical or functional effect in that food. Such incidental food additives include:

1) substances that are incorporated into the food as a result of being an ingredient of another food (Example: An ingredient in pasta sauce is diced tomatoes that contain citric acid for pH control. Citric acid must be listed as an ingredient in the diced tomatoes. But the pasta sauce label does not have to list citric acid as an ingredient unless additional citric acid is added during processing of the pasta sauce.); and 2) processing aids that: i) are added to the food during processing but are removed from the food before packaging, ii) are added to the food during processing, are converted to constituents normally present in the food, and do not significantly increase the amount of these constituents normally found in the food; and iii) are added to the food for their technical or functional effect during processing but are present at insignificant levels in the final product and have no technical or functional effect in the final product.

Although incidental food additives may not appear in the ingredient statement of foods labeled as organic foods, these additives must be subjected to the same National List evaluation process as other processed food ingredients.

Recommendation:

Organic processors must list all incidental processing aids that are added to their organic foods during processing in the Organic Handling Plan. For each incidental processing aid used, the organic processor must document, to the satisfaction of the certifying agent, that the substance is non-synthetic or synthetic. For incidental processing aids that are synthetic, the organic processor must: 1) document that the food cannot be processed without the synthetic incidental processing aid;

2) document that a good faith effort has been made to source and develop a non-synthetic alternative; and 3) demonstrate progress over time in the effort to replace or discontinue use of the synthetic incidental processing aid.

