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August 5, 2005

Arthur Neal
Director, Program Administrator
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW Room 4008
So., Ag Stop 0268
Washington, DC 20250

Dear Mr. Neal and the National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. American Natural Soy feels it is imperative that these items continue to remain on the NOP list of allowed substances.

Name of Substance	Location on National List	Reason for continued allowance	Supporting Documents
Acid – Citric Acid	205.605(a)	Used as a preservative to prevent oxidation of oils. No other option available in organic form.	MSDS, Specific product information, IOCP Verification of Excluded Methods
Bentonite	205.605(a)	Used as a processing aide in the refining of organic oils. No other option available in organic form.	MSDS, Specific product information, IOCP Verification of Excluded Methods
Diatomaceous Earth	205.605(a)	Used as a processing aide in the refining of organic oils.	MSDS, Specific product information, IOCP Verification of Excluded Methods
Nitrogen (oil free)	205.605(a)	Used to prevent oxidation of oils.	MSDS, IOCP Verification of Excluded Methods

Respectfully submitted by,

Diane Young

Diane Young
Director of Quality Assurance
American Natural Soy, Inc

Background

The Webster Dictionary defines refining as "the process to reduce to a pure state; separate from extraneous matter or cleanse from impurities". For oil, an adsorptive substance is added to the crude oil to reduce the concentration of one or more undesirable components. Traditional oil refining uses strong chemicals to achieve the clarity, color, flavor, and physical stability. In the world of organics, refining agents such as citric acid, bentonite, diatomaceous earth, and nitrogen are used to achieve clarity and improve color, flavor and physical stability.

Citric Acid is produced by the fermentation of carbohydrates with the aide of Aspergillus niger. It's primary function is that of a preservative preventing the oxidation of refined oils.

Bentonite is a claylike material of volcanic origin. The mode of action is electrostatic. The flat surface of a hydrated bentonite platelet is negatively charged. The positively charged trace metals and phospholipids adsorb to the surface of the bentonite and are both removed by filtration.

Diatomaceous earth is extremely porous neutral earth composed essentially of inert siliceous skeletons of diatoms which are very minute unicelled organisms. The primary use of diatomaceous earth is to aid in the filtering of the unwanted material.

Liquid nitrogen is inert, colorless, odorless, non-corrosive, nonflammable, and extremely cold. Nitrogen makes up the major portion of the atmosphere (78.03% by volume, 75.5% by weight. The inert properties of nitrogen make it a good blanketing gas. Nitrogen blanketing is used to protect refined oil from contact with air, increasing shelflife by further preventing oxidation.