

From: Mathews, Richard  
Sent: Thursday, May 02, 2002 10:07 AM  
To: Benham, Katherine  
Cc: Strother, Toni  
Subject: FW: TAP Report for Dewaxed Flake Shellac

For the meeting book and the Board.

-----Original Message-----

From: Suraj Singhania [mailto:renshel@vsnl.com]  
Sent: Thursday, May 02, 2002 10:04 AM  
To: Strother, Toni  
Cc: Pooler, Bob; Mathews, Richard; Kim Burton (E-mail)  
Subject: Re: TAP Report for Dewaxed Flake Shellac

Dear Mr. Strother,

Thank you for your email.

Please note our following comments regarding the TAP report, which may kindly be forwarded to the NOSB for their consideration :

1) TAP Reviewer Discussion, Reviewer 1 (lines 380 to 408)

There are no pesticide residues either in the Sticklac or Seedlac since the Sticklac is collected from trees found in the natural wild forests. The trees grow naturally and there are no pesticides used to help their growth or the growth of the lac insect.

The ethanol used during the purification of Seedlac to the Dewaxed Flake Shellac is 100% Ethanol and food grade.

The activated charcoal used is manufactured by heating naturally available pine wood dust in a closed chamber. Since no chemicals of any kind are used to manufacture the activated charcoal, we are of the opinion that this particular charcoal can also be considered natural and organic.

According to the process of our manufacture already described and the above information, we still feel that the product classifies for addition to the National List. We confirm that the method of our production does not convert a natural polyester resin to a chemical product since the original shellac molecule is not changed or modified in our process. The process used is more of a physical refining without any chemical reactions.

2) Reviewer 3 (lines 500 to 502)

Our petition for inclusion of Dewaxed Flake Shellac is not specific to fruit coating. Since shellac in general is widely used in the confectionery industry, we feel that if the Dewaxed Flake Shellac is added to the National List, the confectionery industry can use a superior product particularly for coating of organic confectionery products. As such we will request that the product be allowed without restrictions.

We hope that with our above comments, Dewaxed Flake Shellac may please be allowed as a 95% organic product without any annotation. This product is very different from the Bleached Shellac (both waxy and wax-free) which may please be highlighted by you, if found appropriate.

We greatly appreciate your help in the entire process. Please feel free to contact us again in case any further clarifications are needed.

Thank you and Best Regards,

Suraj Singhania  
President

----- Original Message -----

From: "Strother, Toni" <Toni.Strother2@usda.gov>

To: <renshel@vsnl.com>

Cc: "Mathews, Richard" <Richard.Mathews@usda.gov>; "Kim Burton (E-mail)" <kburton@jmsmucker.com>; "Pooler, Bob" <Bob.Pooler@usda.gov>

Sent: Thursday, April 11, 2002 12:17 PM

Subject: TAP Report for Dewaxed Flake Shellac

> Attached for your review and information is a copy of the TAP report  
> for Dewaxed Flake Shellac that was forwarded to the National Organic  
> Standards Board (NOSB) this week. You may send any comments regarding  
> the TAP  
report  
> to my attention for forwarding to the NOSB for their consideration.  
> The NOSB will be voting on this material at their May meeting on  
> Tuesday, May 7th in Austin, TX. Details regarding the meeting can be  
> viewed on our web page ([www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)). The Dewaxed Flake  
> Shellac TAP is also posted on the web page under the National List Section;  
"Petitioned Substances"  
> just click on Dewaxed Flake Shellac . Please feel free to give me a call  
> if you have any questions.  
>  
> <<shellac final 4-02.doc>>  
>  
>  
> Toni Strother  
> USDA/AMS/TM/NOP  
> Rm. 4008-S, Ag. Stop 0268  
> 1400 Independence Ave., SW.  
> Washington, DC 20250-0200  
> (202) 690-2624 (voice)  
> (202) 205-7808 (fax)  
>  
> <<Toni Strother (E-mail).vcf>>  
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