

March 1, 2001

Bob Pooler  
National Organic Program  
Agricultural Marketing Specialist  
USDA/AMS/TM/NOP  
1400 Independence Avenue SW  
Room 2945 Ag Stop 0268  
Washington, D.C. 20250

Dear Mr. Pooler:

I have two points to address.

First, at the National Organic Standards Board meeting scheduled for March 6 and 7, "L-cysteine," for processing organic foods, is scheduled for review. I would appreciate being given the opportunity to speak at the meeting in opposition of approval of L-cysteine. I strongly believe that L-cysteine should not be used in organic foods because:

1. Its use will place human health and development at risk.
2. There are alternatives to using L-cysteine in terms of other available materials.
3. L-cysteine, as an individual amino acid, must be considered a synthetic product.

L-cysteine is well recognized by neuroscientists as a neurotoxic amino acid. Although I am unaware of human studies involving L-cysteine, I know a number of people who react to processed food products that contain L-cysteine. I have suffered severe attacks of asthma following ingestion of L-cysteine even though I am not an asthmatic.

In support of my position, I am enclosing the following documents:

1. A copy of a statement from the Web site of Quest IV Health Products, Inc. The statement indicates that L-cysteine is a nonessential amino acid and that "Animals can synthesize it and do not require dietary sources." As a nonessential amino acid, humans have no need to ingest it as a supplemental amino acid because the body will transaminate (change) other amino acids to provide all the L-cysteine that is needed by the body.
2. A published study by John W. Olney entitled "Excitotoxic Food Additives: Relevance of Animal Studies to Human Safety." (In particular, see pages 457-459.) Dr. Olney is a highly respected researcher and member of the National Academy of Science. He is particularly well known for his work in the area of neurotoxic amino acids.
3. A published study by John W. Olney entitled "Excitotoxins in Foods." (In particular, see pages 539-540.)

4. A bibliography, including abstracts when available, of published studies obtained through a topic search of the MEDLINE retrieval service, using the keywords "L-cysteine" and "neurotoxicity."

Second, following the discussion of L-cysteine at the National Organic Standards Board Meeting, I would appreciate being given a few minutes to advise the Board members of a growing problem that consumers are having with organic vegetables.

Thank you for your attention to these matters.

Sincerely yours,



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Enclosures

cc: OMRI (including supporting materials)