

Carrageenan

Handling/Processing

Identification of Petitioned Substance

Chemical Names:	21	Trade Names:
Carrageenan, carragheen, carrageen	22	None
iota-Carrageenan		
kappa-Carrageenan		CAS Numbers:
lambda-Carrageenan		9000-07-1 (general)
		9062-07-1 (iota)
Other Names:		11114-20-8 (kappa)
PES (processed <i>Eucheuma</i> seaweed)		9064-57-7 (lambda)
Carageenan gum		
Chondrus		Other Codes:
Carrageenin		232-524-2 (EINECS, general)
Irish Moss, Irish Moss Extract, Irish Moss Gelose		232-949-3 (EC No., general)
Vegetable Gelatin, Norsk Gelatin		232-949-3 (EC No., iota)
Danish Agar		234-350-2 (EC No., kappa)
Carastay, Carastay C		232-953-5 (EC No., lambda)
<i>Eucheuma spinosum</i> gum		
Marine colloids		
Red seaweed (Rhodophyceae) extract		

Characterization of Petitioned Substance

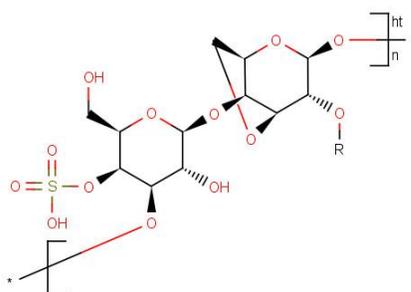
Composition of the Substance:

Carrageenan is a generic term referring to a family of linear polysaccharides (i.e., complex carbohydrate chains) that are extracted from species of red seaweeds (Class *Rhodophyceae*) (van de Velde and De Ruiter, 2002). There are several different carrageenans with slightly varied chemical structures and properties (McHugh, 2003). Different *Rhodophyceae* species produce carrageenans in varying nonhomologous polysaccharide mixtures (McHugh, 2003; van de Velde and De Ruiter, 2002).

Individual carrageenans are best described based on the structure of the disaccharide units (i.e., simple carbohydrate chains) that create the polysaccharide molecule (van de Velde and De Ruiter, 2002). Ideally, each disaccharide in the chain contains a beta-delta-galactopyranose (G-unit) with either an alpha-delta-galactopyranose (D-unit) or 3,6-anhydrogalactose (DA-unit). Other carbohydrate residues commonly exist in carrageenan, such as xylose, glucose, and uronic acids. The disaccharide units are variably sulfated, resulting in a sulfate content of 22% to 38% by weight in commercial carrageenan (van de Velde and De Ruiter, 2002). Other cations, such as ammonium, calcium, magnesium, potassium, and sodium, are also often present in the form of galactose esters (FAO, 2007; U.S. Pharmacopeia, 2010). The three most prevalent, and of highest commercial interest, polysaccharides of carrageenan are iota-, kappa-, and lambda-carrageenan (van de Velde and De Ruiter, 2002; FAO, 2007; U.S. Pharmacopeia, 2010). The repeating molecular structure of kappa-carrageenan is shown in Figure 1. Iota- and lambda-carrageenan are similar in structure, but differ in the number and position of the ester sulfate groups (van de Velde and De Ruiter, 2002; FAO, 2007).

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Figure 1. Repeating Molecular Structure of Kappa-Carrageenan



(Source: ChemIDplus Advanced, 2011)

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Properties of the Substance:

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62 Commercial preparations of carrageenan are nearly odorless powders that are yellowish, tan, or white in
63 color (FAO, 2007). Carrageenan is soluble in hot water (80°C) and variably soluble in room temperature
64 water (20°C), depending on the polysaccharide types present (FMC BioPolymer, 2010). Carrageenan will
65 disperse more readily in water if the powder is first moistened with alcohol, glycerin, or a saturated
66 glucose or sucrose solution (FAO, 2007). Carrageenan is also soluble in boiling milk (FMC BioPolymer,
67 2010).

68
69 The molecular mass of carrageenan varies depending on the sample, but averages 400 to 600 kDa
70 (roughly 6.6×10^{-10} to 10×10^{-10} nanograms) and is no less than 100 kDa in commercial grade mixtures (van de
71 Velde and De Ruiter, 2002). Carrageenan molecules are negatively charged, which allows them to react with
72 positively charged substances like salt ions or proteins (McHugh, 2003). When potassium or calcium salts are
73 added to carrageenan dissolved in boiling water, the solution will form a gel as it cools. The stiffness, resilience,
74 and level of thixotropic flow (i.e., the ability to flow like a thick liquid when stirred, but return to gel when left
75 alone) vary depending on the predominant type of carrageenan (iota, kappa, or lambda) and type of salt used to
76 form the gel. Similarly, carrageenan will form gel matrices through reactions with positively charged proteins
77 such as casein in milk (McHugh, 2003).

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Specific Uses of the Substance:

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81 Carrageenan is used as a food additive in the production of a wide range of processed foods, including
82 dairy products, water-based foods, meat products, beverages, condiments, infant formula, and pet food
83 (McHugh, 2003). Carrageenan can function as a bulking agent, carrier, emulsifier, gelling agent, glazing
84 agent, humectant, stabilizer, or thickener (Codex Alimentarius Commission, 2010). Carrageenan is added
85 to processed foods because it can bind water, promote gel formation, thicken, stabilize, and improve
86 palatability and appearance through interaction with other substances in the food (e.g., proteins, sodium or
87 calcium phosphates, starch, galactomannan, carboxymethylcellulose) (Piculell, 2006). Table 1 provides a
88 detailed list of different food products in which carrageenan is commonly found, and the purpose for its
89 addition to those products.

90

91 Carrageenan is widely used in dairy products to improve texture, thickness, and solubility (McHugh,
92 2003). Carrageenan can successfully prevent separation and maintain texture in dairy products when
93 added in small amounts—around 0.3% in milk gels (such as custards, flans, and creamy fillings), whipped
94 cream, yogurt, and milkshakes, and 0.03% in frozen desserts and liquid milk products (Piculell, 2006).

95

96 Carrageenan can be used as a fat substitute in processed meats, as it improves moisture retention and
97 restores tenderness in low-fat processed meats like hamburgers (McHugh, 2003). For example, recent
98 research showed that ground pork patties with less than 10% total fat and carrageenan at maximum
99 concentrations of 0.75% actually had higher moisture retention after cooking and a similar texture

100 compared to pork patties containing 20% fat and no carrageenan (Kumar and Sharma, 2004). While
 101 carrageenan has been used as a fat replacer in processed meat since at least the early 1990s (Ramirez, 1991),
 102 food science researchers are still exploring the use and no information was found to indicate exactly how
 103 common this use is today.

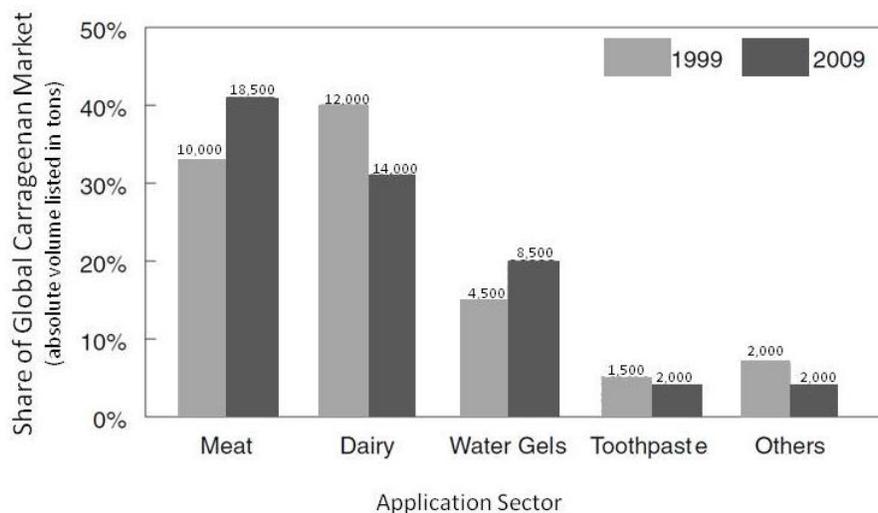
104
 105 **Table 1. Uses of Carrageenan in Food Products**
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Product	Purpose for Addition/Action in Product	Source
Cottage cheese	Prevent separation of whey	McHugh, 2003
Ice cream	Prevent separation caused by addition of gums meant to control texture and ice crystal growth	McHugh, 2003
Flans, custards, cream fillings	Stabilizer, gelling agent	Piculell, 2006
Cheese	Stabilizer	Piculell, 2006
Coffee creamers, evaporated and condensed milk	Prevent separation of fat	McHugh, 2003
Flavored milk (i.e., chocolate milk) and milkshakes	Holds cocoa or other flavoring in suspension	McHugh, 2003; Saha and Bhattacharya, 2010
Whipping cream	Maintain "lightness"	McHugh, 2003
Mousse, pudding, fruit/water gel desserts	Vegetarian substitution for gelatin; stabilizer and emulsifier	McHugh, 2003; Piculell, 2006
Low calorie jellies	Replace pectin and sugar with carrageenan, to help set	McHugh, 2003
Drink mixes (powdered lemonade, fruit punch, etc)	Provide texture when reconstituted in cold water	McHugh, 2003
Sorbet	Provide smooth texture (gelling agent)	McHugh, 2003; Piculell, 2006
Low-fat (i.e. Low-oil) salad dressings	Suspend herbs and provide thicker texture	McHugh, 2003
Low-fat (i.e. Low-oil) mayonnaise	Thicken and stabilize	McHugh, 2003
Relishes	Gelling agent	Piculell, 2006
Pre-cooked poultry products	Injected as brine to improve texture, tenderness and maintain juiciness	McHugh, 2003
Low-fat/low-sodium processed meat and poultry	Improves juiciness and tenderness; behaves like fat and retains moisture through cooking; helps bind meat product during cooking	McHugh, 2003; applegatefarms.com
Fish	Added prior to processing for water retention	Piculell, 2006
Canned pet food	Re-bind meat, create gravy/jelly around meat pieces	McHugh, 2003
Infant formula	Stabilizer	Watson, 2008
Beer	Clarification through precipitating with proteins	McHugh, 2003
Fresh-cut packaged fruits	Slow/control discoloration, maintain texture	Plotto et al., 2006; Bico et al., 2009; Plotto et al., 2010
Tofu	Stabilizer	Saha and Bhattacharya, 2010

107
 108
 109 One newly-explored use of carrageenan in the food industry is as a protective coating on fresh-cut
 110 packaged fruits. Carrageenan coatings function as a gas barrier, adhering to the cut surface of the fruit and
 111 reducing respiration, which slows discoloration (Baeza, 2007). Recent studies have shown that carrageenan
 112 is successful in controlling discoloration, maintaining texture through shelf-life, and providing antibacterial
 113 protection when used as an edible fruit coating on sliced lychee (Plotto et al., 2006), bananas (Bico et al.,
 114 2009), and mangoes (Plotto et al., 2010). While research on the use of carrageenan in the fresh-cut, pre-
 115 packaged fruit industry is present in the peer-reviewed literature, it is unclear how commonly carrageenan
 116 is actually used for this purpose.

117
 118 There is no indication in the literature that the food uses of carrageenan have changed substantially since
 119 the 1995 Technical Advisory Panel (TAP) review for carrageenan (USDA, 1995). However, the distribution
 120 of global carrageenan market among different use sectors has changed over the last decade (Bixler and
 121 Porse, 2010). Figure 2 shows the changing trends in percentages of global carrageenan market occupied by

122 various applications from 1999 to 2009. Specifically, the use of carrageenan in dairy products has declined
 123 from 40% of total carrageenan use to 31% of total use, although absolute volume usage has increased by
 124 nearly 17%. The use of carrageenan in processed meats has increased to 41%, of the total market and
 125 absolute volume usage has increased by 85%. The use of carrageenan in water gels has also increased,
 126 however this mainly reflects the Asian market and not the U.S., where gelatin is preferred over
 127 carrageenan in these products (Bixler and Porse, 2010).
 128



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 130
 131 **Figure 2. Changing Trends in Global Carrageenan Use by Sector, 1999-2009**
 132 (Chart modified from: Bixler and Porse, 2010)
 133

134 Carrageenan is also used in nonfood applications such as air freshener/odor-absorbing gels, and
 135 toothpastes (McHugh, 2003). Recently, the market has opened for nonfood consumer products like
 136 cosmetics, pharmaceuticals (i.e., pill coatings and drug capsules) (Bixler and Porse, 2010), sexual lubricants,
 137 and topical microbicides to protect against HIV, herpes simplex viruses, and potentially human
 138 papillomavirus (Buck et al., 2006).
 139

140 **Approved Legal Uses of the Substance:**

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 142 Carrageenan was added to the National List of Allowed and Prohibited Substances (hereafter referred to as
 143 the National List) on October 31, 2003, allowing its use in organic handling/processing (68 FR 61993). The
 144 addition was a technical correction, and it was noted in the Federal Register that carrageenan was included
 145 in the proposed National List on December 16, 1997, but accidentally omitted from the National List that
 146 was published in the Federal Register on March 13, 2000 (65 FR 13627) and the subsequent final rule (7 CFR
 147 § 205) published on December 21, 2000 (65 FR 80548). Per requirements of the Organic Foods Production
 148 Act of 1990, carrageenan was reviewed and reauthorized five years later (November 2008), as the Secretary
 149 of Agriculture concurred with the National Organic Standard Board's determination that carrageenan is
 150 "critical to organic production and handling operations" (73 FR 59481).
 151

152 According to FDA, carrageenan may be safely used as a direct food additive for human consumption as
 153 long as its use is in accordance with 21 CFR § 172.620. This regulation specifies that carrageenan should be
 154 prepared by aqueous extraction from the following eight species of *Rhodophyceae* seaweeds: *Chondrus crispus*,
 155 *Chondrus ocellatus*, *Euचेuma cottonii*, *Euचेuma spinosum*, *Gigartina acicularis*, *Gigartina pistillata*, *Gigartina*
 156 *radula*, and *Gigartina stellata*.
 157

158 Additionally, 21 CFR § 172.620 specifies that the sulfate content of carrageenan must be within the 20 to 40
 159 percent range, the dominant hexose units must be galactose and anhydrogalactose, and the name
 160 carrageenan must be used on the label. Carrageenan must be used or intended for use in the amount

161 necessary for an emulsifier, stabilizer, or thickener in foods, except for those standardized foods that do not
162 provide for such use.

163
164 Salts of carrageenan are also permitted for safe use as a direct food additive under 21 CFR § 172.626. "Salts
165 of carrageenan" are defined within this regulation as carrageenan meeting the provisions of 21 CFR
166 § 172.620 that has been modified by increasing ammonium, potassium, calcium, or sodium to the level that
167 it is the dominant salt. Salts of carrageenan must be labeled according to the dominant salt, for example
168 "sodium carrageenan." Salts of carrageenan must be used or intended for use in the amount necessary for
169 an emulsifier, stabilizer, or thickener in foods, except for those standardized foods that do not provide for
170 such use.

171

172 **Action of the Substance:**

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174 Carrageenan is added to products during handling because it exhibits a number of desired properties,
175 including:

176

- 177 • Ability to bind moisture (i.e., water, salt solutions), therefore retaining fluid in a product;
- 178 • Ability to stabilize emulsions, inhibit separation due to thickening action and thixotropic
179 properties (i.e., flows like a liquid when stirred, but acts like gel when left alone);
- 180 • Ability to suspend particles, thereby maintaining uniform distribution of insolubles within a
181 solution (i.e. herbs within oil of salad dressing);
- 182 • Displays a minimal viscosity at high temperatures yet thickens and solidifies when cool, which
183 allows for easier processing of certain food products; and
- 184 • Produces gel matrices through changes in heat and reaction with various proteins and cations.
185 (FMC Biopolymer, 2010)

186

187 **Combinations of the Substance:**

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189 Carrageenan is often used in combination with other emulsifiers, gelling agents, or stabilizers, including
190 xanthan gum, locust bean gum, and pectin (McHugh, 2003), in order to achieve the desired actions
191 described above. Locust bean gum is a gelling agent, whereas xanthan gum and guar gum are non-gelling
192 agents; all three are thickening agents (Saha and Bhattacharya, 2010).

193

194

195 Status

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197 **Historic Use:**

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199 Carrageenan-bearing *Chondrus crispus* seaweed was first used in food processing over 600 years ago, when
200 it was boiled with milk to produce flan in the Irish coastal village of Carraghen (van de Velde and De
201 Ruiten, 2002). While used in a variety of food products throughout history in Europe and the Middle East,
202 use of extracted carrageenan as a food additive in the U.S. did not begin until the late 1930s, when it was
203 discovered that carrageenan extracted from *Chondrus crispus* could stabilize chocolate milk (Watson, 2008).

204

205 **OFPA, USDA Final Rule:**

206

207 Carrageenan is currently included on the National List as a nonagricultural (nonorganic), nonsynthetic
208 substance allowed as an ingredient in or on processed products labeled as "organic" or "made with organic
209 (specified ingredients or food groups(s))" (7 CFR § 205.605(a)). There are no annotations or restrictions
210 regarding the origin or use of carrageenan under the National Organic Program.

211

International:

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213
214 The International Federation of Organic Agriculture Movements (IFOAM) lists carrageenan as a
215 permissible food additive (IFOAM, 2006).

216
217 The Codex Alimentarius Commission of the Joint FAO/WHO Food Standards Programme lists
218 carrageenan as a food additive permitted for use in plant-based foods, dairy products, and dairy analogues
219 (excluding fats, oils, and fat emulsions) within the guidelines for organically produced foods (Codex
220 Alimentarius Commission, 2007).

221
222 Carrageenan is permitted for use in Canadian organic handling and processing according to the most
223 recent June 2011 amendment of the Canadian Organic Production Systems Permitted Substances Lists. It is
224 classified on the Lists as a non-organic ingredient allowed in food processing as a food additive (section
225 6.3) and/or processing aid (section 6.6) (CGSB, 2011).

226
227 The European Economic Community (EEC) Council Regulation permits the use of carrageenan as a food
228 additive in preparation of plant-origin organic food products or animal-origin, dairy-based organic food
229 products (Commission of the European Communities, 2008).

230
231 The East African Organic Product Standard and the Pacific Organic Standard both list carrageenan as an
232 additive allowed in organic food processing (East African Community, 2007; Secretariat of the Pacific
233 Community, 2008).

234
235 Carrageenan is not listed in the Japanese Agricultural Standard for Organic Processed Foods (Japanese
236 MAFF, 2006).

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Evaluation Questions for Substances to be used in Organic Handling

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240 **Evaluation Question #1: Describe the most prevalent processes used to manufacture or formulate the**
241 **petitioned substance. Further, describe any chemical change that may occur during manufacture or**
242 **formulation of the petitioned substance when this substance is extracted from naturally occurring plant,**
243 **animal, or mineral sources (7 U.S.C. § 6502 (21)).**

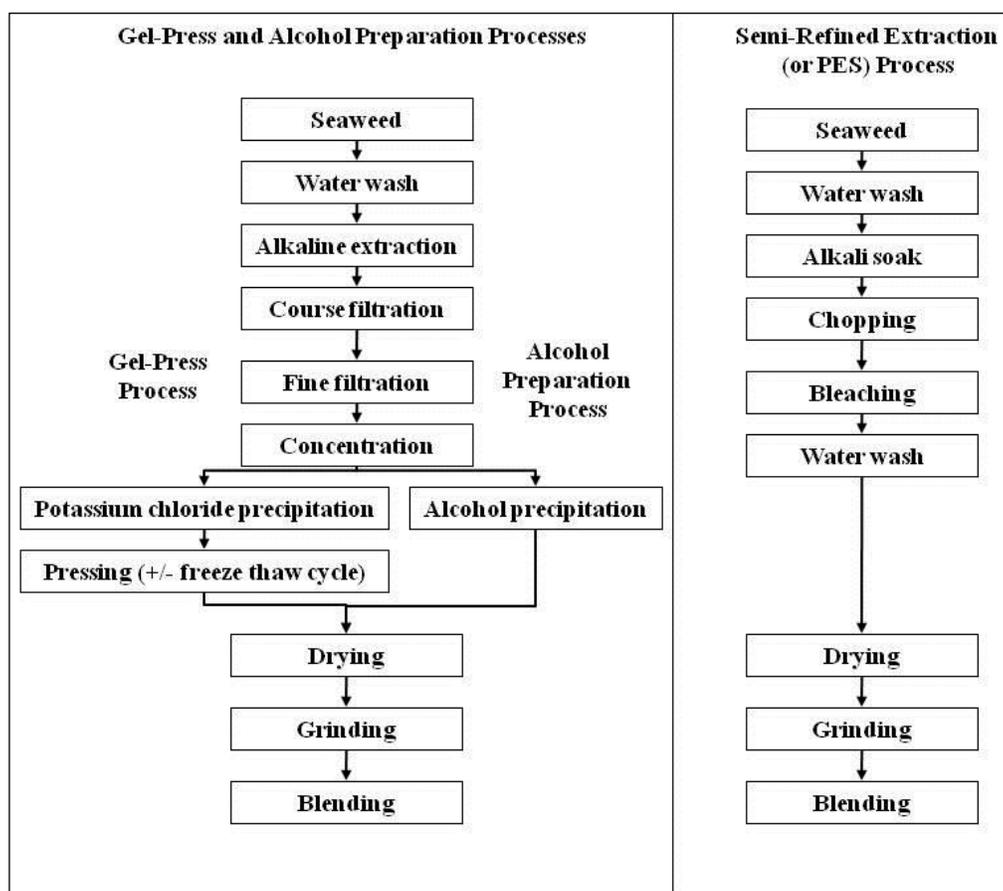
244
245 Carrageenan is extracted from red seaweeds (*Rhodophyceae*) harvested from natural populations or
246 commercially farmed populations (Van de Velde and De Ruiter, 2002). *Eucheuma cottonii* and *Eucheuma*
247 *spinosum* are the most common species used, which grow in the warm waters of the Philippines, Indonesia,
248 and Tanzania (Bixler and Porse, 2010) and produce kappa- and iota-carrageenan, respectively (Imeson,
249 2000). Less common *Chondrus crispus*, which grows in the north Atlantic, *Gigartina* species, from western
250 South America, and *Furcellaria* species, from Northern Europe and Asia, produce both kappa- and lambda-
251 carrageenan (Imeson, 2000).

252
253 After seaweed is harvested, a number of processing methods can be used to produce either refined or semi-
254 refined carrageenan. All of the processes follow the same basic steps (Blakemore and Harpell, 2009;
255 McHugh, 2003; Imeson, 2000). First, the seaweed is sun-dried, baled, and brought to a manufacturing site
256 where it is ground and filtered to remove sand and salt. It is then washed to further remove salt, sand, and
257 other contaminants, and processed through an alkaline treatment method. Next, either refined carrageenan
258 can be separated from other seaweed materials using centrifugation, filtration, and a precipitation method,
259 or semi-refined carrageenan (PES) can be produced with simple chopping, bleaching, and water washes
260 that dissolve and wash away other seaweed materials. The final steps in the production of both
261 carrageenan products involve drying, grinding, and blending of the product (Blakemore and Harpell, 2009;
262 McHugh, 2003; Imeson, 2000).

263
264 The three main extraction methods used to produce commercial carrageenan, shown in Figure 3, are
265 alcohol preparation, gel press, and semi-refined or PES extraction (Imeson, 2000; Blakemore and Harpell,
266 2009). The gel-press and alcohol preparation method are the same with the exception of how the

267 carrageenan is purified and recovered as a solid from a concentrated solution (Imeson, 2000; McHugh,
 268 2003). These methods use an alkali (e.g., sodium hydroxide, potassium hydroxide, or calcium hydroxide) to
 269 extract carrageenan from the seaweed into an aqueous solution, then use centrifugation, filtration, and a
 270 precipitation method to recover a very pure, solid carrageenan (McHugh, 2003). With the semi-refined
 271 extraction process, an alkali is used to dissolve most extraneous seaweed matter (e.g., cellulose, proteins)
 272 from the carrageenan, so centrifugation or filtration is not necessary and the solid carrageenan can be
 273 recovered simply through drying/evaporation of water (McHugh, 2003). Additionally, the Danisco
 274 Company recently developed a fourth method which is similar to the semi-refined method, but more
 275 expensive, as the alkali treatment is performed in an alcohol slurry. However, it can be used on a wider
 276 variety of seaweed species (CyberColloids, 2011). This method is patented by the Danisco Company, which
 277 has used it in carrageenan production since approximately 1996 (Larson, 1996).

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281
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Figure 3. Three Common Carrageenan Production Methods
 (Chart modified from: Imeson, 2000 and Blakemore and Harpell, 2009)

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The Alcohol Preparation Extraction Method:

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287
 288
 289 Alcohol preparation is the most traditional method, and the only method for extracting lambda-
 290 carrageenan (CyberColloids, 2011). Isopropanol is used to precipitate the carrageenan as a fibrous
 291 coagulate, which is separated from the solution using centrifugation or a sieve, pressed to remove
 292 additional alkaline solvent, and washed again with alcohol to dehydrate (McHugh, 2003). In order for
 293 alcohol preparation to be a cost-effective method for carrageenan production, the alcohol must be
 294 recovered and recycled (McHugh, 2003).

295

The Gel-press Extraction Method:

The gel-press method, which has gained popularity in recent years (van de Velde and De Ruiter, 2004; Bixler and Porse, 2010), can only be used to extract kappa-carrageenan (McHugh, 2003), as kappa-carrageenan has a very specific affinity to form gels in the presence of potassium salts (Imeson, 2000). In this method, kappa carrageenan gel is precipitated out of seaweed in a concentrated potassium chloride solution, then pressed to exclude water before being dried and ground to create carrageenan powder (Imeson, 2000). Additionally, freeze-thaw cycles can be used to exclude even more water prior to the drying phase: when a frozen gel solution thaws, the gel contracts and pushes liquid out through a chemical phenomenon known as syneresis (McHugh, 2003).

The Semi-refined/PES Extraction Method:

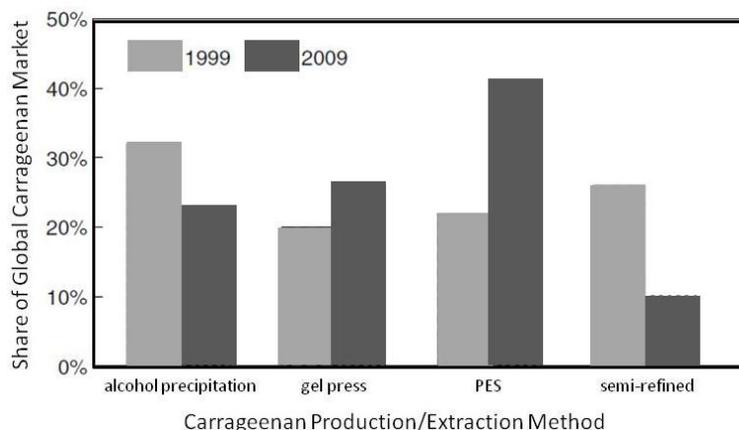
The semi-refined extraction method is the fastest-growing technology for carrageenan manufacturing (Bixler and Porse, 2010). In this method, carrageenan is not technically extracted out of the seaweed; rather, water and alkali are used to wash all other compounds (e.g., soluble proteins, carbohydrates, cellulose) away from the carrageenan (McHugh, 2003). Because this method does not involve expensive steps like centrifugation, concentration, and precipitation, it is cheaper than alcohol preparation or gel-press methods (McHugh, 2003).

Semi-refined carrageenan originally had high bacteria counts making it unsuitable for human consumption unless used in canned products, since the canning process kills the bacteria (McHugh, 2003). However, the manufacturing method has been modified and refined (Van de Velde and De Ruiter, 2002). Producers of carrageenan in the Philippines now add an additional step to the semi-refined extraction method so that the product, referred to as processed *Eucheuma* seaweed or PES, is suitable for human consumption (McHugh, 2003). After alkali treatment, the carrageenan solution is treated with bleach, and drying occurs in a closed dryer system. In some cases, the dried carrageenan is then washed with ethanol and vacuum evaporated, or treated with superheated steam, to eliminate bacterial contamination (McHugh, 2003). PES contains 8 to 15% acid insoluble materials, opposed to only 2% for carrageenan that is produced through the alcohol preparation or gel-press methods (Blakemore and Harpell, 2009). The acid insoluble materials are mostly cellulose and protein materials from the algae that result in different solubility characteristics between PES and carrageenan extracts. Both products are regulated as the food additive carrageenan by the FDA and must adhere to the same standards for microbial contamination and limits for other contaminants such as heavy metals (Blakemore and Harpell, 2009; U.S. Pharmacopeia, 2010). The introduction of PES to the market approximately 25 years ago has reconfigured the geographic distribution of production around the world, and the percentages of total product being produced by each method (Bixler and Porse, 2010).

The alkaline treatment processes used in the manufacture of refined carrageenan and PES cause chemical changes to occur in the algal extracts. Prolonged treatment with alkali promotes internal molecular rearrangements and modifications of the polysaccharide backbone (Imeson, 2000; McHugh, 2003; Blakemore and Harpell, 2009). Some sulfate groups are removed from the molecule, and the proportion of 3,6-anhydrogalactose units is therefore increased (McHugh, 2003). These rearrangements in effect reduce the number of bends in the polysaccharide chain, thereby strengthening the inter-chain associations (Blakemore and Harpell, 2009). The predominant carrageenan present (i.e., kappa, iota, or lamda), and resulting properties of the final product, are determined by the amount of time and the type of alkali used for alkali treatment (McHugh, 2003; Imeson, 2000). For example, kappa carrageenans are modified in a way that allows adjacent chains to form helical structures, resulting in firm, brittle gels (Imeson, 2000). Iota carrageenans are modified to form weak, elastic gels, and lamda carrageenans do not gel but rather form high viscosity liquids (McHugh, 2003). In other words, treatment in an alkaline solution promotes structural changes to the polysaccharide molecule, resulting in a carrageenan product with specifically desirable gel strengths and textures (Imeson, 2000; McHugh, 2003; Blakemore and Harpell, 2009).

There is no indication in the literature that the types of manufacturing methods for carrageenan have changed substantially since the 1995 TAP review for carrageenan (USDA, 1995). However, there have been

351 changes in the use patterns of those methods. Figure 4 shows the changing percentages of world carrageen
352 market share by production method, including alcohol precipitation, gel press, semi-refined, and PES, from
353 1999 to 2009. Overall, carrageenan production through PES methods has increased from 22% to 41% (which
354 is an increase from 0% in the early 1970s), and gel-press methods has increased from 20% to 26% (Bixler
355 and Porse, 2010). Conversely, alcohol precipitation methods have declined from 32% of the world market
356 share to 23%, and semi-refined carrageenan production has decreased from 26% to 10% of the global
357 market production. The overall volume increase in carrageenan sales during the same time period was 2 to
358 3% per year (Bixler and Porse, 2010).
359



360
361 **Figure 4. Changing Trends in Global Carrageenan Production Methods, 1999-2009**
362 (Chart modified from: Bixler and Porse, 2010)
363

364 **Evaluation Question #2: Is the substance synthetic? Discuss whether the petitioned substance is**
365 **formulated or manufactured by a chemical process, or created by naturally occurring biological**
366 **processes (7 U.S.C. § 6502 (21)).**
367

368 Carrageenan is a naturally occurring polysaccharide extracted from seaweed, and therefore considered
369 non-synthetic. As stated in the response to Evaluation Question #1, industrial extraction methods use alkali
370 treatment to facilitate rearrangements and modifications in the chemical structure of the polysaccharide for
371 manufacture of commercial-grade products (Imeson, 2000; McHugh, 2003; Blakemore and Harpell, 2009).
372 Carrageenan that is produced using those methods is considered synthetic.
373

374 **Evaluation Question #3: Provide a list of non-synthetic or natural source(s) of the petitioned substance**
375 **(7 CFR § 205.600 (b) (1)).**
376

377 All carrageenan is obtained from natural sources. Sources of carrageenan are red seaweeds of the class
378 *Rhodophyceae* (Van de Velde and De Ruiter, 2002). There is no indication in the literature that any new
379 species of seaweeds or other (i.e., non-seaweed) sources are being used to manufacture carrageenan since
380 the 1995 TAP review for carrageenan (USDA, 1995). However, there have been shifts in the global regions
381 supplying seaweeds for the production of carrageenan. The Asia-Pacific region has remained the largest
382 source of carrageen-producing seaweed, supplying over 50% of the market from 1999 through 2009, and
383 the Americas have similarly maintained 16-18% of the global market (Bixler and Porse, 2010). However,
384 production levels decreased in Europe and increased substantially in China (Bixler and Porse, 2010).
385

386 As stated in the response to Evaluation Question #1, manufacturing of carrageenan results in chemical
387 modifications to the seaweed extract. No information was found to indicate that any form of commercially-
388 available carrageenan is extracted without chemical modifications.
389

390 **Evaluation Question #4: Specify whether the petitioned substance is categorized as generally**
391 **recognized as safe (GRAS) when used according to FDA's good manufacturing practices (7 CFR §**
392 **205.600 (b)(5)). If not categorized as GRAS, describe the regulatory status. What is the technical function**
393 **of the substance?**

394
395 Chondrus extract, or carrageenan specifically from *Chondrus crispus*, has been categorized as GRAS since
396 1958 (Watson, 2008), when used in accordance with good manufacturing practice (21 CFR § 182.7255).
397 Although carrageenan from other sources is not specifically listed as GRAS, in 1960, 21 CFR § 172.620 listed
398 carrageenan as a food additive that can be sourced from eight different seaweed species, including
399 *Chondrus crispus*. A review for carrageenan in general, and not just the extract of Chondrus, was completed
400 in 1973 by the Select Committee on GRAS Substances (SCOGS) (U.S. FDA, 2006). The Committee
401 concluded that "no evidence in the available information on carrageenan demonstrates a hazard to the
402 public when it is used at levels that are now current and in the manner now practiced," however
403 uncertainties exist and additional studies should be conducted. Therefore, it appears that all forms of
404 carrageenan acceptable as food additives in the U.S. are now considered GRAS. The technical function of
405 carrageenan under 21 CFR § 182.7255 is a stabilizer. 21 CFR § 172.620 lists functions of emulsifier, stabilizer,
406 and thickener.

407
408 **Evaluation Question #5: Describe whether the primary function/purpose of the petitioned substance is**
409 **a preservative. If so, provide a detailed description of its mechanism as a preservative (7 CFR § 205.600**
410 **(b)(4)).**

411
412 The primary use of carrageenan is to modify and maintain texture and/or consistency in processed foods
413 (Piculell, 2006; McHugh, 2003). Therefore, its primary function or purpose is not as a preservative.
414 However, when used as a protective coating for fresh-cut packaged fruits, carrageenan can be described as
415 a preservative because it functions to slow respiration on the cut fruit surface, thereby controlling
416 discoloration and natural textural changes (Plotto et al., 2010; Bico et al., 2009; Baeza, 2007; Plotto et al.,
417 2006).

418
419 **Evaluation Question #6: Describe whether the petitioned substance will be used primarily to recreate**
420 **or improve flavors, colors, textures, or nutritive values lost in processing (except when required by law)**
421 **and how the substance recreates or improves any of these food/feed characteristics (7 CFR § 205.600**
422 **(b)(4)).**

423
424 No information was found to suggest that carrageenan is used to recreate flavors, colors, textures, or
425 nutritive values lost during processing. Carrageenan is mainly used to produce or enhance texture during
426 processing by acting as a thickening, gelling, emulsifying, or stabilizing agent (Piculell, 2006; McHugh,
427 2003). However, there are no indications that it is added to processed foods in order to restore these
428 qualities where they exist during small batch production. Carrageenan is used to maintain texture when it
429 is used as a stabilizer to prevent separation of ingredients, but is unclear whether this use could be
430 considered to improve or enhance texture. Carrageenan is a source of dietary fiber (Piculell, 2006) but there
431 is no indication that it is added to processed foods in order to restore dietary fiber lost in processing.

432
433 When carrageenan is used as a coating on fresh-cut, pre-packaged fruits, it is being used to maintain color
434 and texture that would normally be lost during the product's shelf-life (Plotto et al., 2010; Bico et al., 2009;
435 Plotto et al., 2006) by inhibiting respiration on the fruit's cut surface (Baeza, 2007). This use is not
436 restorative.

437
438 **Evaluation Question #7: Describe any effect or potential effect on the nutritional quality of the food or**
439 **feed when the petitioned substance is used (7 CFR § 205.600 (b)(3)).**

440
441 A study conducted in 1974 found that addition of carrageenan to skim milk at a dietary level of 4% had no
442 influence on growth rate, diet energy efficiency, utilization of iron, or absorption of protein, fat or calcium
443 in rats (Tomarelli et al., 1974). When carrageenan is used in products such as processed meats and
444 sausages, it often functions as a fat replacer and therefore increases the nutritional quality of the food by
445 significantly decreasing the fat content and cholesterol (Kumar and Sharma, 2003).

446
447 No other information was found on the effects or potential effects of carrageenan on the nutritional quality
448 of food.

449
450 **Evaluation Question #8: List any reported residues of heavy metals or other contaminants in excess of**
451 **FDA tolerances that are present or have been reported in the petitioned substance (7 CFR § 205.600**
452 **(b)(5)).**

453
454 No reports of excessive levels of heavy metals or other dangerous contaminants in carrageenan have been
455 identified, and no substances listed on FDA's Action Levels for Poisonous or Deleterious Substances in
456 Human Food have been reported as contaminants of concern for carrageenan. However, carrageenan has a
457 high tendency to sequester metal ions such as arsenic, lead, zinc, and copper (Piculell, 2006). The
458 specifications for carrageenan in the seventh edition of the "Food Chemicals Codex" include that it contain
459 no more than 3 mg/kg arsenic, 2 mg/kg cadmium, 5 mg/kg lead, 1 mg/kg mercury, 0.1% of the residual
460 solvents ethanol, isopropanol, or methanol singly or in combination, and that is contain between 20% and
461 40% sulfate as ester sulfate (U.S. Pharmacopeia, 2010). The heavy metal content in carrageenan from semi-
462 refined processing (i.e., PES) is higher than the heavy metal content in carrageenan from gel-press or
463 alcohol preparation processing, but is still well below FDA tolerances (Imeson, 2000).

464
465 **Evaluation Question #9: Discuss and summarize findings on whether the manufacture and use of the**
466 **petitioned substance may be harmful to the environment or biodiversity (7 U.S.C. § 6517 (c) (1) (A) (i)**
467 **and 7 U.S.C. § 6517 (c) (2) (A) (i)).**

468
469 Cold water species of red seaweed used to make carrageenan (from Chile, Mexico, Canada, France) are
470 generally harvested from wild populations (Bixler and Porse, 2010); however recent shifts have been seen
471 in cultivated populations of seaweed in waters near South America (Buschmann et al., 2008). As with any
472 collection from wild populations, harvest levels must be in check to ensure that population size remains at
473 sustainable levels and that the surrounding ecosystem is not negatively affected. For example,
474 overharvesting of *Gigartina* species at its northernmost limit in Chile resulted in a severe reduction in
475 population size and a complete crash in the total number of seaweed landings in the early 2000s (Faugeron
476 et al., 2004). Overall biomass was reduced and individual plants were smaller, resulting in many infertile
477 plants (Faugeron et al., 2004).

478
479 Warm water species of red seaweed used to make carrageenan are mainly cultivated in the Philippines,
480 Indonesia, and Tanzania using vegetative growth methods to produce and maintain seaweed populations
481 (Bixler and Porse, 2010). To create a seaweed farm, fronds of seaweed are tied to strings between wooden
482 poles dug into the ground of shallow intertidal lagoons (Bryceson, 2002). In some cases where water is
483 deeper, floating lines and rafts are used. Cultivation of non-native seaweed presents serious bio-invasive
484 risks for nearby marine communities (Chandrasekaran et al., 2008). Fragments of seaweed often escape
485 from cultivation sites, presumably through physical forces like wave action, storms (including seasonal
486 monsoon patterns), or strong tides, and disperse to other areas of the ocean. The fragments can catch on
487 coral or other oceanic features, and vegetatively propagate to establish new colonies that overtake the
488 existing ecosystems (Chandrasekaran et al., 2008). For example, a Philippine-derived species introduced to
489 Hawaii in the 1970s was recently shown to be spreading from the cultivation site at a rate of 250 meters per
490 year and is competing with native corals for space (Conklin and Smith, 2005). The same species was
491 introduced at a single site in the Gulf of Mannar, South India, in 2002 and by 2007 had invaded and
492 completely covered coral reefs 100 meters away, smothering and shadowing the corals and hindering the
493 coral's ability to support other species in the system (Chandrasekaran et al., 2008). Invasive seaweed also
494 poses a risk in systems where the coral reef is already dead: dead coral undergo a natural cycle of erosion
495 and resettlement of coral onto the reef from nearby thriving coral communities. When seaweeds take over,
496 they prevent this process and contribute to reef degradation (Chandrasekaran et al., 2008).

497
498 Seaweed farming is generally considered to be the most environmentally friendly type of aquaculture, as it
499 requires no fertilizers, does not cause major physical landscape changes, and can even serve to mediate
500 eutrophication and other forms of pollution (Eklof and Kautsky, 2006). However, seaweed farming is not

501 without environmental impacts; the presence of a seaweed farm has been shown to affect aquatic
502 community composition by inducing population dynamic changes in bacteria, meiofauna, benthic
503 macrofauna, fish, and corals (Eklof and Kautsky, 2006). Establishment of a cultivation plot can disrupt
504 benthic community structure, as existing seagrass is cut, as well as disrupt general marine ecosystems, as
505 existing niches are interrupted by the presence of new seaweed plants (Zemke-White and Smith, 2006).
506 While large landscape modifications are not made, crops of seaweed tied low to the ground can result in
507 abrasion of the sea floor and changes to sedimentation. Seaweed farms can increase shade of underlying
508 habitats, and in some places lines or poles are purposefully anchored to corals (Zemke-White and Smith,
509 2006). Moreover, *Eucheima* species, which are most commonly used in seaweed farming, can experience
510 physiological stress due to fluctuations in environmental conditions such as temperature or salinity
511 (Bryceson, 2002). When under stress, these species produce and release volatile halogenated organic
512 compounds which can inhibit growth and survival of epiphytes or other organisms in the ecosystem
513 (Bryceson, 2002).

514
515 A recent review and analysis of various mariculture models by Tityanov and Tityanova (2010) argued that
516 sustainable management of monodominant natural seaweed populations is preferable to farming of
517 seaweeds from an environmental impact standpoint. Cultivated non-native species, especially when they
518 escape the cultivation plot and bioinvade corals and other marine areas, are not susceptible to controls by
519 the naturally present grazing fish, physical clearing methods (i.e. natural tidal motions), or aquatic
520 chemistry of the ecosystem, and so populations grow unchecked (Chandrasekaran et al., 2008).
521 Management of indigenous species for carrageenan production, rather than introduction of exotic species,
522 may yield less carrageenan product but does not pose the ecological risk (Chandrasekaran et al., 2008).

523
524 However, advancements in methods of integrated farming of seaweed, fish, mollusks, and crustaceans
525 could help make seaweed farming more sustainable (Tityanov and Tityanova, 2010). Integrated seaweed
526 cultivation can result in some positive impacts on the ecosystem. For example, combined mussel and
527 seaweed cultivation areas in Brazil have been shown to improve water quality through decreasing the
528 dissolved inorganic nitrogen concentration, which helps mitigate eutrophication of the system (Pellizzari
529 and Reis, 2011). Further, experiments that discharged fish tank water into seaweed cultivation areas
530 showed that the seaweed acted as a biofilter to remove 80% of the ammonium and 26% of the phosphate
531 from the water (Hayashi et al., 2006), suggesting a benefit to cultivating seaweed in existing fish farms.

532
533 The industrial manufacture of carrageenan is a process that produces large amounts of alkaline waste
534 water which may pose environmental problems. For example, the Shemberg plant, which is the largest
535 plant in the Philippines, creates 2361 m³ of waste water with a pH of 12-13, and a biochemical oxygen
536 demand of 1539 kg (Zemke-White and Smith, 2006). While the Philippines' Department of Environment
537 and Natural Resources regulates discharge of effluent from these plants, many plants either operate at
538 levels that are above the level that would allow standards to be met, or simply choose to forgo expensive
539 water treatment and pay fines instead (Zemke-White and Smith, 2006).

540
541 Additionally, the act of farming seaweed can result in a number of secondary environmental impacts, such
542 as increased pollution on beaches and physical damages to reefs, coastal ecosystems, and mangroves
543 (Zemke-White and Smith, 2006). Many farmers use plastic "straws" to tie the seaweed to lines and plastic
544 bottles and Styrofoam as floats – and seldom are these materials recycled or disposed of properly.
545 Processing operations build raised platform structures on which to dry harvested seaweed in a way that
546 limits contamination with sand. In some areas of the Philippines, the platforms are constructed on stilts on
547 the reef, resulting in damage to the reefs. In other areas, the platforms are built on shore and can disrupt
548 coastal habitat. Regardless of where the platforms are built, mangrove wood is often preferred for use in
549 platforms and for tie-down stakes, since it does not rot as fast as other wood alternatives – resulting in a
550 need for regulation and active enforcement to prevent damage to the biologically important mangrove
551 forest (Zemke-White and Smith, 2006).

552

553 **Evaluation Question #10: Describe and summarize any reported effects upon human health from use of**
554 **the petitioned substance (7 U.S.C. § 6517 (c) (1) (A) (i), 7 U.S.C. § 6517 (c) (2) (A) (i) and 7 U.S.C. § 6518**
555 **(m) (4)).**

556
557 Despite a long history of approved use as a food additive, carrageenan has been alleged to pose human
558 health risks. In 1969, degraded carrageenan was shown to induce cecal and colonic ulceration in guinea
559 pigs (Marcus and Watt, 1969), the first report of such potential adverse effects (Watson, 2008). Since then,
560 many studies have been published showing that exposure to degraded carrageenan causes bleeding and
561 ulceration of the colon in some laboratory animals (EC SCF, 2003). Degraded carrageenan, also called
562 poligeenan, has an average molecular weight of 20 to 30 kDa and has been widely used in immune system
563 experiments to induce inflammation in immune system experiments (Benford et al., 2008). As a result of
564 these findings, the FDA proposed regulations that commercial-grade carrageenan could not have a
565 molecular weight under 100 kDa (Watson, 2008), though these regulations were never amended and the
566 proposal was withdrawn in 1979 (Tobacman, 2001). Still, the presence of degraded carrageenan in
567 commercially available carrageenan decreased from approximately 25% in 1983 (Benford et al., 2008) to
568 undetectable levels by 2001 (EC SCF, 2003). The molecular weight average of commercially-available
569 carrageenan ranges from 453 to 652 kDa (Uno et al., 2001).

570
571 Today, both concern and debate exists over human health hazards from not only direct use of degraded
572 carrageenan in foods, but also based on the idea that acid hydrolysis in the stomach following consumption
573 of non-degraded carrageenan could result in formation of degraded carrageenan, which could then
574 potentially promote colon cancer (Tobacman, 2001; Carthew, 2002). In 2001, Joanne K. Tobacman
575 published a review of 45 studies dated from 1969 through 1997, that showed that exposure to degraded
576 and/or undegraded carrageenan was associated with intestinal lesions such as ulcerations and neoplasms
577 in several different animal models, including ferret, guinea pig, monkey, mouse, rat, and rabbit (Tobacman,
578 2001). Animal studies published since 1997 that were not included in Tobacman's review have shown
579 conflicting results. While some studies have verified that carrageenan is associated with induction or
580 promotion of gastrointestinal tract inflammation, ulcerations and/or neoplasms in animal models (e.g.,
581 Benard et al., 2010 and human tissues (e.g., Borthakur et al., 2007; Bernard et al., 2010), other studies have
582 contradicted this finding (e.g., *in vivo*: Weiner et al., 2007; and *in vitro*: Tobacman and Walters, 2001).

583
584 As stated in the response to Evaluation Question #4, carrageenan is listed as GRAS by the FDA (U.S. FDA,
585 2006). The toxicology of carrageenan has been reviewed by the Joint FAO/WHO Expert Committee on
586 Food Additives (JECFA) and the group acceptable daily intake (ADI) for carrageenan and processed
587 *Eucheuma* seaweed was categorized as "not specified" in 2001 (Benford, 2001). This means that the total
588 dietary intake of the substance arising from its use at the levels necessary to achieve the desired effect in
589 food and from its acceptable background levels in food, does not, in the opinion of JECFA, represent a
590 hazard to health (Benford, 2001). JECFA has since maintained the "not specified" ADI classification at the
591 64th meeting in 2008 they stressed that this classification applied to food additive uses other than infant
592 formula (Benford et al., 2008). JECFA advised that carrageenan should not be used in infant formula
593 intended for children under 13 months of age based on a concern over the narrow margin of exposure
594 between the level of carrageenan consumed through infant formula and the lowest doses reported to cause
595 inflammatory responses in laboratory rats and mice (Benford et al., 2008). Similarly, the European
596 Commission Scientific Committee on Food (now the European Food Safety Authority) concluded in 2003
597 that there is no evidence of adverse effects in humans from exposure to food-grade carrageenan, yet
598 advised against use of carrageenan in infant formula due to a lack of information regarding possible
599 absorption of carrageenan in the immature gut and effects of carrageenan on the immature immune system
600 (EC SCF, 2003). While the committee noted there was insufficient evidence for lowering the ADI or
601 otherwise limiting carrageenan intake levels, they did suggest a limit be specified that no more than 5% of
602 food-grade carrageenan should fall below 50 kDa (EC SCF, 2003). Conversely, the US FDA does permit
603 carrageenan in infant formula, because it concluded that the health benefit (preventing fat separation and
604 therefore provides uniform nutrition) outweighs the potential risks (Watson, 2008).

605

606 **Evaluation Information #11: Provide a list of organic agricultural products that could be alternatives for**
607 **the petitioned substance (7 CFR § 205.600 (b)(1)).**
608

609 Potential food additives that may be substituted for carrageenan to achieve a similar functionality when
610 used either alone or in combinations include alginates, guar gum, gum Arabic, locust bean gum, and
611 xanthan gum (Tobacman, 2001). Gelatin can also be used in some products, such as water gel desserts
612 (Bixler and Porse, 2010).
613

614 Guar gum, gum Arabic, locust bean gum, and gelatin are agricultural processing ingredients. They are
615 listed under the NOP final rule section 205.606 as “nonorganically produced agricultural products allowed
616 as ingredients in or on processed products labeled as ‘organic’” (7 CFR § 205.606). To be allowed in organic
617 processed foods they must be water-extracted and not produced or handled with the use of sewage sludge,
618 genetic engineering, genetically modified organisms, or ionizing radiation (7 CFR § 205.105). Nonorganic
619 forms may only be used when the certifier determines that the ingredient is not commercially available in
620 organic form (7 CFR § 205.606).
621

622 Xanthan gum and alginates, including ammonium, calcium, potassium, and sodium alginate, are synthetic,
623 nonagricultural processing ingredients. However, they are allowed for use in organic processed products
624 (7 CFR § 205.605(b)).
625

626 It is also possible to substitute fats for carrageenan in some products (Tobacman, 2001).
627

628 In fresh-cut, pre-packaged fruits, the non-agricultural but allowed substances citric acid and ascorbic acid
629 can be used instead of carrageenan to prevent discoloration, and calcium chloride or calcium citrate can be
630 used as firming agents to maintain texture (Plotto and Narciso, 2006).
631

632 No organic agricultural alternatives for this use of carrageenan were identified.
633

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