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Received  
7/10/01*

June 30, 2001

National Organic Standards Board  
C/o Robert Pooler  
Agricultural Marketing Specialist, USDA/AMS/TM/NOP  
Room 2510-So., Ag Stop 0268  
P.O. Box 96456  
Washington, D.C. 20090-6456

**Received by OMRI**

**JUL 11 2001**

Dear Robert,

Enclosed is a petition seeking the evaluation of Fish Gelatin for inclusion on the National Organic List. Tazo Tea Company and Norland Products Incorporated are submitting this petition. Tazo currently uses Norland Fish Gelatin as a process aid in the clarification of an organic iced tea product.

**CATEGORY FOR INCLUSION ON THE NATIONAL LIST:**

We are seeking evaluation of the fish gelatin as a **Nonagricultural substance allowed for use as a process aid in processed products labeled as "organic" or "made with organic ingredients"**. While fish are agricultural substances, the extraction and purification of fish gelatin converts the material into a powder that is not readily identified as from fish. Consequently, like many of the vegetable-source gums, we understand the proper category to be "nonagricultural substances – allowed."

1. Common name – Fish gelatin
2. Manufacturer –  
Kenny & Ross Ltd.  
RR#3, Shelburne  
Port Saxon, NS  
Canada B0T 1W0  
Tel: 902/637-2616
3. Intended use – Used in foods as a beverage clarifier
4. Handling activities – Added directly to beverage in conjunction with other clarifiers to cause binding of haze causing components which can then be filtered out along with the gelatin. The rate of use is 1 lb gelatin per 220 gallons of tea. Once the gelatin is filtered out (along with bentonite and diatomaceous earth), it is taken by a farmer for land application as a fertilizer. This is done in Oregon where these substances are not considered hazardous, as they are all organic in nature.
5. Sources – Fish gelatin is manufactured from collagen found in the skin and connective tissue of fish. The gelatin is extracted from the collagen with heat, water and acid and is filtered, purified, dried and ground into a granular powder. (see attached detailed process flow)
6. Gelatin is considered GRAS by the FDA and safe for use in food. I could not find any previous reviews.
7. Regulatory Status – Fish gelatin is recognized in the Food Chemicals Codex and meets USP and European Pharmacopoeia standards.
8. Chemical Abstract Number – CAS# 900-70-8
9. Physical Properties of the Substance and Chemical Mode of Action – Fish gelatin is a dry powder or granule with less than 15 % moisture and 2 % ash. It is considered

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GRAS by the FDA. Gelatin is a positively charged protein, which when used in conjunction with a negatively charged agent like bentonite, rapidly forms a dense coagulum with haze causing proteins which can then be filtered out using a standard plate and frame type filter.

10. MSDS and NIEHS report – see the attached MSDS. There was no information available at the NIEHS website on this substance.
11. Research Information – See attached data included from websites and Journal abstracts.
12. Justification Statement –

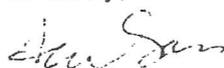
We have found a gelatin bentonite combination to work best in removing the haze causing proteins found in tea, while hot processing. In addition, gelatin fining can be used in conjunction with diatomaceous earth filtration which is less expensive and more versatile than membrane or ultra-filtration for the range of teas and botanicals that Tazo filters. Other clarifying agents that can be used are silica gel, and tannic acid. Tannic acid requires cold processing, and finding an exact-dosage is difficult. Silica fining agents require settling, and would also work best in conjunction with gelatin.

Fish gelatin is a Kosher/Halaal gelatin that provides an acceptable alternative to bovine or porcine gelatin.

Please also see the attached documentation from Norland Products, the supplier of the Kenney & Ross fish gelatin.

Please contact me with any questions at the phone number listed below:  
(503) 736-9005.

Sincerely,



Teri Gass  
Technical Services Manager  
Tazo Tea Company