



Sunset 2016 Review NOSB Final Review Handling Substances April 2015

As part of the National List Sunset Review process, the NOSB Handling Subcommittee has evaluated the need for the continued allowance for or prohibition of the following substances for use in organic handling.

§205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”
(a) Nonsynthetics allowed:

Egg white lysozyme

Reference: 7 CFR 205.605(a) Egg white lysozyme (CAS # 9001–63–2)

Technical Report: [2011 TR: Enzymes](#), [2003 TAP: Enzymes, Plant and Fungal](#)

Petition(s): [06/2002](#)

Past NOSB Actions: [05/2003](#) - NOSB review and recommendation for addition to the National List; [11/2009](#) - Recommendation to relist

Regulatory Background: Added to National List effective 09/12/06 [71 FR 53299](#); Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

Sunset Date: 9/12/2016

Subcommittee Review

NOSB Review

The NOSB found Egg White lysozyme is no longer essential to organic handling. No comments were received regarding the need for the material from organic handlers during two comment periods in August 2014 and March 2015.

Motion to remove Egg white lysozyme (CAS # 9001–63–2) from 205.605(a)

Motion by: Tracy Favre

Seconded by: Jean Richardson

Yes: 11 No: 3 Abstain: 0 Recuse: 0 Absent: 1

Outcome: Motion passed. NOSB completed its sunset review.

L-Malic Acid

Reference: 7 CFR 205.605(a) L-Malic acid (CAS # 97-67-6)

Technical Report: [04/2003](#)

Petition(s): [11/2002](#)

Past NOSB Actions: [05/2003](#) - NOSB review and recommendation for addition to the National List; [11/2009](#) -



Recommendation to relist

Regulatory Background: Added to National List effective 09/12/06 [71 FR 53299](#); Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

Sunset Date: 9/12/16

Subcommittee Review

NOSB Review

The NOSB found no concerns regarding the continued listing of L-Malic Acid. This material satisfies all OFPA criteria, and public comment confirmed its current use and need.

Motion to remove L-Malic acid (CAS # 97-67-6) from section 205.605(a)

Motion by Joe Dickson

Seconded Tracy Favre

Yes: 2 No: 12 Abstain: Recuse: Absent: 1

Outcome: Motion failed. NOSB completed its sunset review.

Microorganisms

Reference: **7 CFR 205.605(b)** Microorganisms - any food grade bacteria, fungi, and other microorganism.

Technical Report: [2014 TR](#), [2003 TAP](#)

Petition(s): [12/2002](#)

Past NOSB Actions: [05/2003](#) - NOSB review and recommendation for addition to the National List; [11/2009](#) - Recommendation to relist

Regulatory Background: Added to National List with annotation, effective 09/12/06 [71 FR 53299](#),

Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

Sunset Date: 9/12/16

Subcommittee Review

NOSB Review

The NOSB found no concerns regarding the continued listing of Microorganisms. Based on public comment, information from the Technical Report and compliance with OFPA criteria, the NOSB recommends continued listing.

Motion to remove Microorganisms from 205.605(b)

Motion by: Zea Sonnabend

Seconded by: Jean Richardson

Yes: 0 No: 14 Abstain: 0 Recuse: 0 Absent: 1



Outcome: Motion failed. NOSB completed its sunset review.

§205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”

(b) Synthetics allowed:

Activated charcoal

Reference: 7 CFR 205.605(b) Activated charcoal (CAS #s 7440 - 44 - 0; 64365 - 11 - 3) only from vegetative sources; for use only as a filtering aid.

Technical Report: [08/2002 Activated Carbon](#)

Petition(s): [05/2002 Charcoal/Activated Carbon](#)

Past NOSB Actions: [9/2002](#) - NOSB review and recommendation for addition to the National List;

[11/2009](#) - Recommendation to relist

Regulatory Background: Added to National List with annotation, effective 09/12/06 [71 FR 53299](#); Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

Sunset Date: 9/12/16

Subcommittee Review

NOSB Review

There was no new information presented to the NOSB that would call this material into question and as such the NOSB found no concerns regarding the continued listing of Activated Charcoal.

While it appears that activated charcoal as currently listed is still needed by organic handlers, progress has been made in looking for alternatives to the current listed material. The NOSB would like to encourage stakeholders to continue to pursue these organic alternatives if available and whenever possible.

Motion to remove activated charcoal (CAS #s 7440–44–0; 64365–11–3) from §205.605(b).

Motion by: Harold Austin

Seconded by: Tracy Favre

Yes: 1 No: 13 Abstain: 0 Recuse: 0 Absent: 1

Outcome: Motion failed. NOSB completed its sunset review.

Peracetic acid

Reference: 7 CFR 205.605(b) Peracetic acid/Peroxyacetic acid (CAS # 79 -21- 0). Peracetic acid/Peroxyacetic acid (CAS # 79-21-0)—for use in wash and/or rinse water according to FDA limitations. For use as a sanitizer on food contact surfaces.



Technical Report: [2000 TAP \(for processing\)](#)

Petition(s): [2008 Peracetic Acid](#)

Past NOSB Actions: [11/2000](#) - NOSB review and recommendation for addition to the National List (Note: alternate name as periacetic in meeting notes). [11/5/09](#) - Recommendation to renew

Regulatory Background: Added to National List, effective 09/12/06 [71 FR 53299](#). Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

Sunset Date: 9/12/16

Subcommittee Review

NOSB Review

Public comment provided no new evidence about unacceptable adverse impacts on human health or the environment. Commenters noted Peracetic acid/Peroxyacetic acid had less adverse impact than allowed alternatives. Additionally, the NOSB finds that Peracetic acid/Peroxyacetic acid satisfies the OFPA criterion and supports its continued listing.

Motion to remove Peracetic Acid (CAS # 79-21-0), from §205.605b

Motion by: Tom Chapman

Seconded by: Zea Sonnabend

Yes: 0 No: 14 Abstain: 0 Recuse: 0 Absent: 1

Outcome: Motion failed. NOSB completed its sunset review.

Cyclohexylamine

Reference: **7 CFR 205.605(b)** Cyclohexylamine (CAS # 108 - 91 - 8) for use only as a boiler water additive for packaging sterilization.

Technical Report: [02/2001](#)

Petition(s): [11/2000 Cyclohexylamine](#)

Past NOSB Actions: [10/2001](#) - NOSB review and recommendation for addition to the National List; [11/2009](#) - Recommendation to relist

Regulatory Background: Added to National List 09/12/06 [71 FR 53299](#), Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

Sunset Date: 9/12/16

Subcommittee Review

NOSB Review

In August 2014, the NOSB put forth a request for information regarding the continued use of Cyclohexylamine in boiler systems and received limited information regarding its continued use in



organic processing. Information received by the NOSB suggests that most manufacturers have already begun a move away from this material. This information, in conjunction with the potential for harm to human health and the environment, is the reason the NOSB is recommending removal from the National List.

Motion to remove the boiler amines, Cyclohexylamine (CAS # 108 -91-8), Diethylaminoethanol (CAS # 100–37–8), and Octadecylamine (CAS # 124-30-1), all three with the annotation “for use only as a boiler water additive for packaging sterilization”, from section 205.605(b)

Motion by: Tracy Favre

Seconded: Jean Richardson

Yes: 14 No: 0 Abstain: 0 Recuse: 0 Absent: 1

Outcome: Motion passed. NOSB completed its sunset review.

Diethylaminoethanol

Reference: **7 CFR 205.605(b)** Diethylaminoethanol (CAS # 100 -37- 8) for use only as a boiler water additive for packaging sterilization.

Technical Report: [2/2001 TAP](#)

Petition(s): [11/2000](#)

Past NOSB Actions: [5/2002](#) - NOSB review and recommendation for addition to the National List;

[11/5/09](#) - Recommendation to relist

Regulatory Background: Added to National List, effective [09/12/06 71 FR 53299](#), Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

Sunset Date: 9/12/2016

Subcommittee Review

NOSB Review

In August 2014, the NOSB put forth a request for information regarding the continued use of Diethylaminoethanol in boiler systems and received limited information regarding its continued use in organic processing. Information received by the NOSB suggests that most manufacturers have already begun a move away from this material. This information, in conjunction with the potential for harm to human health and the environment, is the reason the NOSB is recommending removal from the National List.

Motion to remove the boiler amines, Cyclohexylamine (CAS # 108 -91-8), Diethylaminoethanol (CAS # 100–37–8), and Octadecylamine (CAS # 124-30-1), all three with the annotation “for use only as a boiler water additive for packaging sterilization”, from section 205.605(b)

Motion by Tracy Favre

Seconded Jean Richardson

Yes: 14 No: 0 Abstain: 0 Recuse: 0 Absent: 1

Outcome: Motion passed. NOSB completed its sunset review.



Octadecylamine

Reference: 7 CFR 205.605(b) Octadecylamine (CAS # 124–30–1) for use only as a boiler water additive for packaging sterilization.

Technical Report: [02/2001 TAP](#)

Petition(s): [11/2000](#)

Past NOSB Actions: [10/2001](#) - NOSB review and recommendation for addition to the National List [11/5/09](#) - Recommendation to renew

Regulatory Background: Added to National List, effective 09/12/06 [71 FR 53299](#), Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

Sunset Date: 9/12/2016

Subcommittee Review

NOSB Review

In August 2014, the NOSB put forth a request for information regarding the continued use of Octadecylamine in boiler systems and received limited information regarding its continued use in organic processing. Information received by the NOSB suggests that most manufacturers have already begun a move away from this material. This information, in conjunction with the potential for harm to human health and the environment, is the reason the NOSB is recommending removal from the National List.

Motion to remove the boiler amines, Cyclohexylamine (CAS # 108 -91-8), Diethylaminoethanol (CAS # 100–37–8), and Octadecylamine (CAS # 124-30-1), all three with the annotation “for use only as a boiler water additive for packaging sterilization”, from section 205.605(b)

Motion by Tracy Favre

Seconded Jean Richardson

Yes: 14 No: 0 Abstain: 0 Recuse: 0 Absent: 1

Outcome: Motion passed. NOSB completed its sunset review.

Sodium acid pyrophosphate

Reference: 7 CFR 205.605(b) Sodium acid pyrophosphate (CAS # 7758-16-9) - for use only as a leavening agent.

Technical Report: [09/2001 TAP](#) (report is for Sodium Phosphates as a group).

Petition(s): [10/2002](#); [06/2009 petition for expanded use](#)

Past NOSB Actions: [05/2003](#) - NOSB review and recommendation for addition to the National List; [11/2009](#) - recommendation to relist; [04/2011](#) - recommendation on expanded use

Regulatory Background: Added to National List, effective 09/12/06 [71 FR 53299](#), Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

Sunset Date: 9/12/2016



Subcommittee Review

NOSB Review

The NOSB found no concerns regarding the continued listing of Sodium acid pyrophosphate (SAPP) on the National List. Comments were largely supportive of continued listing, indicating that SAPP is widely used and essential. Additionally, removal from the list would impact the availability, quality and variety of organic bakery items.

Motion to remove Sodium acid pyrophosphate (SAPP) (CAS # 7758-16-9) -for use only as a leavening agent, from 205.605(b)

Motion by: Joe Dickson

Seconded by: Tracy Favre

Additional discussion: none

Yes: 3 No: 11 Abstain: 0 Recuse: 0 Absent: 1

Outcome: Motion failed. NOSB completed its sunset review.

Tetrasodium pyrophosphate (TSPP)

Reference: **7 CFR 205.605(b)** Tetrasodium pyrophosphate (CAS # 7722–88–5) - for use only in meat analog products.

Technical Report: [2002 TAP](#); [2014 Limited Scope TR](#)

Petition(s): [12/2001](#)

Past NOSB Actions: [9/17/2002](#) - NOSB review and recommendation for addition to the National List; [11/5/09](#) - Sunset Recommendation to relist

Regulatory Background: Added to National List with annotation, effective 09/12/06 [71 FR 53299](#), Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

Sunset Date: 9/12/2016

Subcommittee Review

NOSB Review

The NOSB had concerns that this substance was put on the list by a former NOSB despite the fact that the majority of the 2002 TAP reviewers were against it, it didn't meet several of the OFPA criteria, and the information about which products it was used in (and therefore why it was specifically necessary for those products) was proprietary. Based on information from a 2014 Technical Report as well as the lack of public support, the NOSB has determined that there are ample alternatives to TSPP and therefore propose to remove it from the list.

Motion to remove Tetrasodium Pyrophosphate (CAS # 7722–88–5) - for use only in meat analog products, from 205.605(b).

Motion by: Zea Sonnabend

Seconded by: Tracy Favre



Yes: 14 No: 0 Abstain: 0 Recuse: 0 Absent: 1

Outcome: Motion passed. NOSB completed its sunset review.