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)
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)
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.


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.

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. Additionaly, the NOSB finds that Peracetic acid/Peroxyacetic acid satisfies the OFPA criterial 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
Inorganic 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), Diethy laminoethanol (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.

Diethy laminoethanol

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


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 Diethy laminoethanol 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), Diethy laminoethanol (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.


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.


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.