

**FORMAL RECOMMENDATION BY THE  
NATIONAL ORGANIC STANDARDS BOARD (NOSB)  
TO THE NATIONAL ORGANIC PROGRAM (NOP)**

**Date:** 11-11-06

**Subject: Sunset Renewal Vote for Lecithin, bleached under 205.605b synthetics allowed.**

**Chair: Kevin O'Rell**

**Recommendation**

The NOSB hereby recommends to the NOP the following:

Rulemaking Action: XXX

Guidance Statement: \_\_\_\_\_

Other: \_\_\_\_\_

**Statement of the Recommendation (including Recount of Vote):**

The Board recommends renewing **Lecithin, bleached** 205.605b synthetics allowed.

**NOSB Vote: Motion:** Andrea Caroe **Second:** Bea James

*Board vote: Yes - 11 No- 3 Abstain- 0 Absent - 0*

**Rationale Supporting Recommendation (including consistency with OFPA and NOP):**

Sunset Material Vote

**Response by the NOP:**

# National Organic Standards Board

## Final Recommendation for Lecithin, bleached

October 19, 2006

**I. List: 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food groups.”**

**(b) Synthetics allowed**

### II. Committee Summary:

On April 20, 2006, as part of the Sunset Review process, the Board voted not to re-list bleached lecithin, based on public comment from the industry which indicated that the organic and non-synthetic forms of lecithin, bleached and unbleached could fulfill the same functions in an organic system. New detailed information was received during the last comment period from several manufacturers that use this as an ingredient. It has become clear that although there are plentiful non-synthetic and organic alternatives to synthetic bleached lecithin in liquid form, there is currently no such alternative for bleached lecithin in dry, de-oiled form,

It is the goal of this Board to encourage the development of new organic alternatives to conventional materials. The emergence in the last four years, of a variety of organic alternatives to bleached liquid lecithin is a clear example that the National List process is working as it was intended: to promote and not inhibit the development organic alternatives to conventional materials. It is the hope of the Board that in the coming years, we will be asked to consider increasing petitions for the removal from the National List of conventional materials for which organic alternatives have been made commercially available. Nevertheless, it is now clear that there is neither a non-synthetic, nor an organic alternative to dry, de-oiled synthetic lecithin.

It is not possible to re-new the dry form and not re-new the liquid form, because annotations cannot be entertained as part of the Sunset Review. Therefore, at this time we see no choice but to recommend that renewal of lecithin, bleached.

The Board strongly hopes that a petition will be presented in short order to restrict the use of bleached lecithin to dry forms, only.

### III. Board Recommendation

The Board recommends renewing the following substance(s) in this use category:

**Lecithin, bleached**

*Moved: Andrea Caroe*

*Seconded: Bea James*

*Board vote: Yes - 11*

*No- 3*

*Abstain- 0*

*Absent- 0*