

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

Date: 12/5/09

Subject: Sodium Acid Pyrophosphate (CAS # 7758-16-9) Sunset Review

Chair: Jeff Moyer

Recommendation

The NOSB hereby recommends to the NOP the following:

Rulemaking Action: X

Guidance Statement:

Other:

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

Sodium Acid Pyrophosphate, with its annotation, was reviewed for sunset by the NOSB at the November 2009 meeting. A summary of the Handling committee's recommendation is attached. No comments were received during the meeting that disagreed with the committee's recommendation.

The NOSB voted to recommend relisting of Sodium Acid Pyrophosphate (CAS #7758-16-9) for use only as a leavening agent on §205.605(b) with 13 voting yes, 0 no votes and 2 absent.

NOSB Vote: **Motion:** Steve DeMuri

Second: Julie Weisman

Board vote: Yes - 13 No- 0 Abstain- 0 Absent - 2

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

Response by the NOP:

National Organic Standards Board
Handling Committee Recommendation for §205.605(b)
Sunset of Sodium Acid Pyrophosphate

September 9, 2009

I. List:

National Organic Program Subpart G: The National List of Allowed and Prohibited Substances. §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

II. Committee Summary:

Sodium Acid Pyrophosphate (SAPP) was first petitioned on 10/31/02 and added to the National List §205.605(b) effective on September 12, 2006 by Final Rule TM-04-01FR based on the NOSB recommendation of May 2003.

Sodium acid pyrophosphate (CAS # 7758-16-9) was originally petitioned for use as a leavening acid in baked goods, and was given the annotation “for use only as a leavening agent” when originally recommended for listing by the NOSB. It is a relatively common food additive with USDA and FDA approval for many functions in conventional foods. In this intended use, it is used as an acid to react with sodium bicarbonate (baking soda) to produce a controlled release of the CO₂ that leavens the baked good. SAPP is prepared by partial neutralization of phosphoric acid with sodium hydroxide or sodium carbonate to form monosodium phosphate, which is followed by molecular dehydration of that substance under controlled conditions at 250 degrees C to form SAPP. Environmental impact from manufacture and use is minimal, and it is not considered toxic to humans.

The TAP review referred to by the NOSB in their original recommendation was for the general class of materials “Sodium Phosphates”, dated 9/21/01. Three reviewers agreed that the substance is a synthetic, and that it should be listed on the National List for the petitioned use, with limits as per Good Manufacturing Practices. A fourth reviewer also agreed it was a synthetic, but proposed that all sodium phosphates be prohibited from organic products, but approved only for products labeled “made with organic ingredients”.

The NOSB has received three public comments in support of, and no public comments opposed to, the relisting Sodium Acid Pyrophosphate in response to the Federal register notice of the sunset of Sodium Acid Pyrophosphate (AMS-TM-07-0136). No public comments have been received opposing the continued use of Sodium Acid Pyrophosphate for use only as a leavening agent in organic handling.

III. Committee Recommendations

The Handling Committee recommends the continued listing of Sodium Acid Pyrophosphate for use only as a leavening agent on §205.605(b).

Moved: Steve DeMuri

Second: Katrina Heinze

Committee Vote: Yes- 5 No- 0 Absent- 1 Abstain- 0 Recuse- 0