

**Formal Recommendation by the  
National Organic Standards Board (NOSB)  
to the National Organic Program (NOP)**

**Date:**           **October 28, 2010**

**Subject:**       **Sunset review of silicon dioxide on National List**

**Chair:**          **Daniel G. Giacomini**

**The NOSB hereby recommends to the NOP the following:**

Rulemaking Action            X

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

Silicon dioxide is common additive in the food production and handling, where it is used in multiple ways, such as a flow agent, to absorb water, a foam suppressant, a filtration aid, and as an insect management tool. The NOSB recommends that silicon dioxide be renewed and relisted on 7 CFR §205.605(b) without annotation. The NOSB unanimously passed the motion to relist silicon dioxide by a vote of 14-0.

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

The recommendation to re-list silicon dioxide in 7 CFR §205.605(b) was made in accordance with the National Organic Program and the NOSB's Policy & Procedures Manual. The substance is consistent with OFPA 1990 and NOP regulations and evaluation criteria.

**NOSB Vote:**

<b>Moved: John Foster</b>		<b>Second: Steve DeMuri</b>		
<b>Yes: 14</b>	<b>No: 0</b>	<b>Abstain: 0</b>	<b>Absent: 0</b>	<b>Recusal: 0</b>

**National Organic Standards Board  
Handling Committee  
Sunset Recommendation – 2012  
Silicon Dioxide**

**September 7, 2010**

**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 group(s)).”**

(b) Synthetics allowed

Silicon dioxide

**Committee Summary**

Silicon dioxide is common additive in the production of foods, where it is used primarily as a flow agent in powdered foods, to absorb water in hygroscopic applications, and in some cases used to suppress foaming in liquids under agitation. It is the primary active component of diatomaceous earth which has many uses ranging from filtration to insect control.

In 2007 (docket TM-04-07) public comment asserting that the inclusion of silicon dioxide on the National List was no longer necessary due to the availability of a certified organic alternative substance. This comment was provided by the manufacturer of the proposed alternative substance. At that time and since that time, insufficient documentation has been provided (such as testimonials from food manufacturers using the proposed alternate) to demonstrate the utility of the proposed alternate in all applications where silicon dioxide is presently used. Several commenters supported of re-listing these materials prior to the April 2010 NOSB meeting.

Review of the original recommendation, historical documents, and public comments does not reveal unacceptable risks to the environment, human, or animal health as a result of the use or manufacture of these materials. It does require special handling due to inhalation risks; limitations on its use and handling are governed by worker safety protocols and Good Manufacturing Practices. There is no new information contradicting the original recommendation which were the basis for the previous NOSB decisions to list the material.

The Handling Committee is aware that a petition to remove silicon dioxide from the National list is currently in the NOP review process; the complete petition had not reached the Handling Committee in time to review and vote at the October 2010 NOSB meeting. We intend on reviewing the petition in due course.

### **Committee Recommendation(s)**

The handling committee recommends the renewal and inclusion of the following substance in this use category as published in the final rule:

Silicon dioxide

### **Committee Vote**

Motion: John Foster  
Yes: 6      No: 0

Second: Steve DeMuri  
Abstain: 0      Absent: 1