

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

**Date:** May 25, 2012

**Subject:** Cellulose: Listing at § 205.605(a) for Sunset 2013

**Chair:** Barry Flamm

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

Rulemaking Action      **X**

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

The recommendation is to re-list cellulose to 205.605(b) with the following modified annotation:

Cellulose—for use in regenerative casings, powdered cellulose as an anti-caking agent (non-chlorine bleached) and filtering aid.

The vote was 14 yes, 1 no, 0 abstentions or recusals.

The board also passed a backup recommendation to re-list the material with the existing annotation, in accordance with the NOSB policy on annotation changes during sunset review.

The vote was 11 yes, 3 no, 1 abstention, 0 recusals

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

Review of the original recommendation, the 2001 TAP review, historical documents, the 2007 sunset recommendation, and public comments does not reveal unacceptable risks to the environment, human, or animal health as a result of the use or manufacture of this material. There is no new information contradicting the original recommendation which was the basis for the previous NOSB decisions to list and again re-list this material.

**Committee Vote Motion 1: To Relist**

**Moved:** Joe Dickson      **Second:** Zea Sonnabend

**Yes: 14      No: 1      Abstain: 0      Absent: 0      Recusal: 0**

**Committee Vote Motion 2: Backup vote**

**Moved:** Joe Dickson

**Second:** Harold Austin

**Yes:** 11

**No:** 3

**Abstain:** 1

**Absent:** 0

**Recusal:** 0

**National Organic Standards Board  
Handling Committee  
2013 Sunset Proposal  
Cellulose on § 205.605(b)**

**March 20, 2012**

**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**

**Cellulose—for use in regenerative casings, as an anti-caking agent (non-chlorine bleached) and filtering aid.**

**Committee Summary**

Cellulose, in its natural form, is the main component of plant cell walls and one of the most abundant organic substances on earth. However, most commercially available cellulose is produced from wood pulp or other plant sources through a delignification process that results in sufficient chemical change to render the substance synthetic. While there are many uses for cellulose in food production, the 2002 Technical Advisory Panel (TAP) report focused on the petitioned uses for and forms of the substance – as a filtering aid, as a component of processed meat casings, and as an anti-caking agent. The current annotation restricts the substances use to these specific areas. While the production of non-synthetic (and even organic) cellulose is technically possible, no commercial sources of non-synthetic cellulose are currently known.

Review of the original recommendation, the 2001 TAP review, historical documents, the 2007 sunset recommendation, and public comments does not reveal unacceptable risks to the environment, human, or animal health as a result of the use or manufacture of this material. There is no new information contradicting the original recommendation which was the basis for the previous NOSB decisions to list and again re-list this material.

**Committee Recommendation(s)**

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

Cellulose—for use in regenerative casings, as an anti-caking agent (non-chlorine bleached) and filtering aid.

**Committee Vote**

Motion: Harold Austin      Second: Zea Sonnabend  
Yes: 5      No: 0      Abstain: 0      Recuse: 0      Absent: 1