

*Omni Foods  
Manufacturer*

May 25, 2006

National Organic Standards Board  
USDA/AMS/TM/NOP, Room 2510-So., Ag Stop 0268, P.O. Box  
96456, Washington, D.C. 20090-6456.  
Phone: 202/720-3252. Fax: 202/205-7808.

This letter serves as a petition from Omni Foods Manufacturer to add an ingredient to 205.606.

- 1) The petition is for non-organic substances allowed in or on processed products labeled as “organic” or “made with organic”
- 2) The ingredient name is Bean Thread, made with Sweet Potato Starch and Water. It is all-natural, with no additives.



Photo pulled from wikipedia.org

More information gathered from [www.wikipedia.org](http://www.wikipedia.org):

**Cellophane noodles** (also known as **bean threads**, **bean thread noodles**, or **glass noodles**), are a type of clear Asian noodle made from [mung bean starch](#), water, and sometimes also other ingredients including potato starch.

They are generally sold in dried form, boiled to reconstitute, then used in soups, stir fried dishes, or [spring rolls](#). They are called "cellophane noodles" because of their resemblance to [cellophane](#), a transparent material.

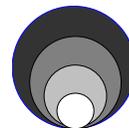
In [Korean cuisine](#), such noodles are called *dang myeon* (hangul: 당면; hanja: 唐麵; also spelled *dang myun*, *dangmyun*, *tang myun*, or *tangmyun*). They are most often made from sweet potato starch, and are the main ingredient in a popular dish called [japchae](#).

The type of bean thread Ohana Foods would like to use is based purely on sweet potato starch. Information of sweet potato starch follows:

Although the leaves and shoots of sweet potatoes are also edible, the [starchy](#) tuberous roots are by far the most important product. In some [tropical](#) areas, they are a staple food-crop. Besides starch, they are rich in [dietary fiber](#), [vitamin A](#), [vitamin C](#), and [vitamin B6](#). All cultivars are more-or-less sweet-flavored.

In 1992, the Center for Science in the Public Interest compared the nutritional value of sweet potatoes to other vegetables. Considering fiber content, complex [carbohydrates](#), [protein](#), [vitamins](#) A and C, [iron](#), and [calcium](#), the sweet potato ranked highest in nutritional value. According to these criteria, sweet potatoes earned 184 points, 100 points over the next on the list, the common potato.(NCSPC)

Sweet potato varieties with dark orange flesh have more [Vitamin A](#) than those with light colored flesh and their increased cultivation is being encouraged in Africa where Vitamin A deficiency is a serious health problem.



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The roots are most frequently boiled, fried, or baked. They can also be processed to make [starch](#) and a partial [flour](#) substitute. Industrial uses include the production of [starch](#) and industrial [alcohol](#).

- 3) The intended use is for an added food ingredient to our organic vegetarian potsticker
- 4) The Bean Thread's mode of action will be to provide texture to the organic vegetarian potsticker
- 5) The source of the Bean Thread is sweet potato starch. Bean Thread is made by mixing sweet potato starch and water, then being put through an extruder to make long, thin noodles. The noodles are then air-dried.
- 6) To our knowledge, there have been no prior reviews by State or private certification programs.
- 7) There are no EPA, FDA or State regulatory authority registrations
- 8) Bean Thread does not have an assigned product number in the Chemical Abstract Service.
- 9) Bean Thread is made up of sweet potato starch and water. To the best of our knowledge, a) there is no chemical mode of action with other substances, including substances used in organic production b) there is no toxicity and environmental persistence c) there is no material impact to the environment from its use or manufacture d) there is no adverse effect to human health. Potential health benefits from its sole ingredient, sweet potato starch, is stated above in # 2. e) there is no adverse effect on soil organisms, drops or livestock.
- 10) There is no Material Safety Date Sheet for bean thread at this time.
- 11) Petitioner has contacted the largest distributor of Asian foods, Korean Farm Inc, one of the largest distributors of starch products, National Starch Company, and one of the largest distributors of organic starch products, Ciranda, Inc. All of these companies have stated that to their knowledge, there is currently no availability of an organic form of bean thread. While organic sweet potato starch does exist, a bean thread form does not exist. Petitioner has also search the Organic Trade Associations' Ingredients supplier list and the internet in general, with no success in finding a supplier of organic bean thread.
- 12) Bean thread is essential to the authenticity of the Petitioner's product. While the existing organic tofu, organic textured soy protein, and organic vegetables in its recipe provide some texture in the Petitioner's product, it does not provide the necessary "chewability" and firmness required. Bean thread is a very common product used in many Asian dishes, and its physical form provides visual authenticity as well as an authentic "mouth feel" to Petitioner's product. Petitioner has also tried organic Asian noodles (made with organic wheat flour) in lieu of bean thread, but it does not provide the necessary texture and visual characteristics.

Petition Justification Statement:

-Bean thread is an all-natural ingredient made of sweet potato starch and water. There are no additives, no preservatives.

- To our knowledge, there are no adverse effects on the environment from the manufacture, use, or disposal of bean thread.

-It is a very common ingredient found in Asian style dishes, but there is no one manufacturing an organic form of bean thread. Various Asian food distributors and American based Potato Starch suppliers have been contacted. There is no supplier, to our knowledge, offering an organic form of bean thread.

-Bean thread gives vegetarian dishes necessary texture and "chew-ability". It is essential to Asian vegetarian dishes because of its shape, flavor (neutral), and texture.

-There are no other organic substitutes to give the product proper texture and Asian authenticity. Textured Soy Protein (TSP) comes the closest, and we are already using organic TSP in the recipe.

-As soon as an organic form of bean thread is commercially available, we will replace the conventional bean thread immediately

Thank you for your time and consideration.

Best Regards,

Andrew Chae  
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