

Yeast

Handling/Processing

Identification of Petitioned Substance

This technical report discusses yeasts for use in organic handling and processing. The scope of this yeast report includes but is not limited to those listed on Table 1. Single cell organisms, such as yeast, do not commonly have a CAS number or chemical name and are instead referenced by their species and/or trade name. Yeast uses in production and handling include their use in fermentation, baking, nutrition, probiotics, and production of yeast extracts. The types of yeast discussed in this technical report include, but are not limited to, autolysate, bakers, brewers, nutritional, and smoked.

Table 1. Yeast used in organic production and handling (Bekatorou, Psarianos and Koutinas 2006; Czeruka, Piche and Rampal 2007)

*Previous name	
Common Name	Trade Names
<i>Saccharomyces cerevisiae</i> (CAS# 68876-77-7)	Red Star®, Active Dry Yeast, Baker's Cream Yeast (Baker's yeast) /Faex, Medicinal Yeast, Levure (Brewers yeast supplement)/ Augustiner, W 177, BSI-72 (Brewer's yeast brewing) /VIN 7, WE 372, ICV D-47 (Wine yeast)
<i>Candida utilis</i> (* <i>Torulopsis utilis</i>)	Lake States®, Torula Yeast
<i>Saccharomyces uvarum</i> (* <i>Saccharomyces carlsbergensis</i>)	NRLL Y-1347 (Brewing Yeast /Wine Yeast)
<i>Saccharomyces bayanus</i>	Premier Cuvee, PDM, EC 1118, Prise de Mousse (Wine Yeast)
<i>Saccharomyces chevalieri</i>	Wine Yeast
<i>Saccharomyces fructuum</i>	Wine Yeast
<i>Saccharomyces pasteurianus</i>	Wine Yeast
<i>Saccharomyces sake</i>	Wine Yeast
<i>Saccharomyces vini</i>	Wine Yeast
<i>Saccharomyces boulardii</i>	Florastor®, OptiBac (Probiotic yeast)
<i>Kluyveromyces lactis</i>	Whey Yeast
<i>Kluyveromyces marxianus</i> (* <i>Kluyveromyces fragilis</i>)	Whey Yeast
<i>Schizosaccharomyces pombe</i>	Probiotic yeast

Summary of Petitioned Use

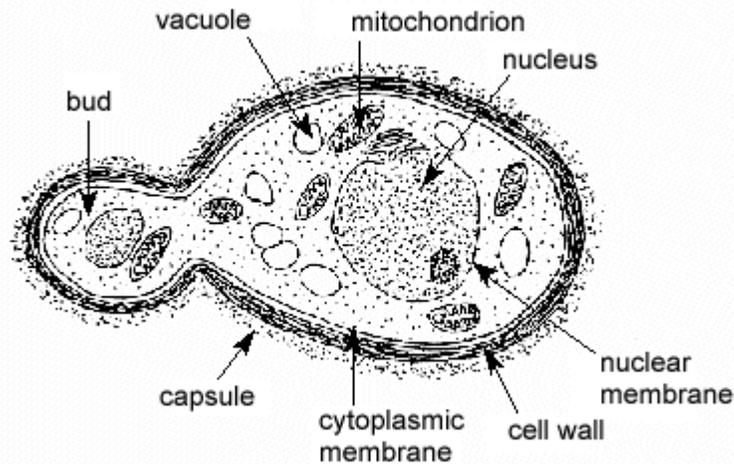
Yeast is listed on the National List at §205.605(a) as an allowed nonsynthetic with the annotation "when used as food or a fermentation agent in products labeled as 'organic,' yeast must be organic if its end use is for human consumption; nonorganic yeast may be used when organic yeast is not commercially available. Growth on petrochemical substrate and sulfite waste liquor is prohibited. For smoked yeast, nonsynthetic smoke flavoring process must be documented." Section §205.605 identifies nonagricultural substances allowed for use as ingredients in or on products to be labeled as "organic" or "made with organic (specified ingredients or food group(s))." (Electronic Code of Federal Regulations: Part 205-National Organic Program 2013). Yeast may not be used in organic production and handling if produced via genetic modification/engineering (§205.105(c) & (e)).

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Characterization of Petitioned Substance

Composition of the Substance:

Yeast are single celled microorganisms that can produce enzymes, carbon dioxide (CO₂), and other metabolites from carbohydrates, whose functional roles are frequently used in the processes of fermentation, baking, flavoring foods, adding nutritional value, and providing health benefits (Evans, Heritage and Killington 2000; Dubey, Maheshwari and Saravanamurthu 2010).



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Figure 1. Yeast cell components and structure (Northern Arizona University 2008).

The interiors of yeast cells are comprised of amino acids, peptides, carbohydrates, salts (Hassan 2011), and monosodium glutamate (MSG) (Dubey, Maheshwari and Saravanamurthu 2010). The cell wall is composed of glucan, a glycoprotein, mannoprotein (Alexandre and Guilloux-Benatier 2006), and chitin (Kollar, et al. 1997). Additionally, yeast contains many types of enzymes, cofactors, and "nucleic acid, particularly RNA, which is obtained from *Candida utilis* and *Saccharomyces sp.*" (Dubey, Maheshwari and Saravanamurthu 2010).

Literature commonly does not identify specific strains of yeast species, such as *Saccharomyces cerevisiae*. For example, though many different strains of *Saccharomyces cerevisiae* exist, and some are only present in specific regions, all strains are commonly referred to in literature as *Saccharomyces cerevisiae* (Cornuet, Karst and Legras 2007). Specific strains appear to be clearly identified in some literature discussing taxonomy, such as *Saccharomyces cerevisiae* Y-12632^{NT} and *Schizosaccharomyces pombe* Y-12796^T (Kurtzman, Fell and Boekhout 2011), and when articles discuss genetically modified strains of yeast, such as *Saccharomyces cerevisiae* strains ML01 and P1Y0 (U.S. FDA 2013).

Source or Origin of the Substance:

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Yeast, such as *Saccharomyces uvarum* and *Saccharomyces cerevisiae*, are ubiquitous in the environment, with many sources depicted in Table 2. They have also been isolated from sources with a high concentration of carbohydrates (sugars), including phyllosphere, grains, fruits, honey, soil, and plant surfaces (U.S. Environmental Protection Agency 1997). Typically, specific yeast strains are grown in a lab environment and used to inoculate growth media for industrial production, as opposed to being gathered from the environment to prevent contamination from undesirable or pathogenic microorganisms (Dubey, Maheshwari and Saravanamurthu 2010).

64 **Table 2.** Origin of yeast strains and their uses (Cornuet, Karst and Legras 2007) Strain origin and grouping.
 65 The number of strains in the population used for F_{ST} tree¹ is lower as the first group may include several
 66 times the same genotype, or because only strains from a well-defined geographical origin are retained for
 67 further analysis (i.e., Tarrogonna strains among Spanish strains, or Firenze strains among Italians)

Origin	Number of analyzed strains	Population' for F_{ST} tree	No. of strains in the population
Alpechin, Spain	1		
Ale beer miscellaneous (France, Belgium, England, The Netherlands ...)	8	Ale Beer	8
Bread, Italy Sicily	20	Bread, Italy, Sicily	19
Bread, miscellaneous (France, Japan, Spain ...)	9	Bread miscellaneous	9
Cassava and banana, Burundi	2		
Cheese, France Camembert	2	Fermented milk	14
Cheese, France Cantal	12	Fermented milk	14
Cider, France Brittany	8		
Distillery, Australia	1		
Distillery, Brazil	8	Distillery, Brazil	8
Distillery, China	8	Distillery, China	7
Fermented milk, Morocco	1	Fermented milk	14
Fruit, Indonesia	1		
Grapes (<i>Vitis amurensis</i>), Russia	1		
Laboratory strains (USA, France ...)	8		
Lagar beer miscellaneous (France, China, USA ...)	15		
Miscellaneous, Japan	1		
Natural resources, Vietnam	5		
Oak exudates, USA	2		
Palm wine, Ivory Coast	1		
Palm wine, Nigeria	20	Palm wine (Nigeria)	19
Rice wine, China miscellaneous	6	Rice wine	10
Rice wine, Laos	3	Rice wine	10
Rice wine, Thailand	1	Rice wine	10
Rum, France French Indies	15	Rum French Indies	15
Sake, Japan	14	Sake (Japan)	11
Sorghum beer, Ghana	4		
Trout guts, Norway	1		
Type strain CBS1907 (Italy)	1		
Wine and fruits, Turkey	7		
Wine, Australia	4		
Wine, Austria	17	Wine Austria	13

¹ F_{ST} is a statistical test used for determining whether two groups of data are statistically different. In this example, it is used to determine the genetic distance between yeast strains. Genetic distance identifies how similar strains are to one another. A large genetic difference indicates a large divergence in genes from a common ancestor.

Wine, Croatia	5		
Wine, France Alsace	100	Wine France Alsace	71
		Wine France Alsace 'Central Europe Group	14

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69 **Properties of the Substance:**

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71 Yeasts are single celled eukaryotic microorganisms in the kingdom Fungi (Bennett 1998; Ingraham 2010).
 72 Eukaryotes are cells which have a nuclear membrane and cell walls. Fungi lack chloroplasts unlike plants,
 73 and are heterotrophs, a type of organism that consumes living and dead organic materials for energy and
 74 food (Bennett 1998). Fungi accomplish this task by releasing proteolytic, glycolytic, or lipolytic enzymes to
 75 digest organic matter, or by absorbing small molecules such as amino acids and simple sugars through
 76 their cell wall (Baron 1996). The Kingdom Fungi includes both macroscopic organisms such as mushrooms,
 77 and microscopic organisms such as yeast and mold (Ingraham 2010). Yeasts, unlike molds and mushroom
 78 fungi, exist as individual cells instead of forming "filamentous, vegetative cells called hyphae," which are
 79 able to be interconnected with other cells as a multi-cellular body (Baron 1996).

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81 Yeasts have two primary methods of reproducing: budding, and fission. Budding occurs when the parent
 82 cell enlarges and a protrusion forms along the cell wall, forming a bud. The bud eventually either breaks off
 83 from the parent cell, or remains partially conjoined via elongated cells forming a pseudo mycelium, a small
 84 multicellular structure. The dimorphic type of fungi and yeasts which produce septate are "capable of
 85 adapting their structures to changes in their environment" and forming mycelia instead of pseudomycelia
 86 (Evans, Heritage and Killington 2000). Fission is another form of yeast cell division, where a parent cell
 87 divides into two daughter cells in a manner similar to the "transverse binary fission seen in bacterial
 88 reproduction" (Evans, Heritage and Killington 2000).

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90 Yeast species are generally grown under aerobic (presence of oxygen) conditions, and fermented under
 91 anaerobic (lack of oxygen) conditions, which in the presence of sugar produces ethanol (Bekatorou,
 92 Psarianos and Koutinas 2006).

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94 "Morphologically, *Saccharomyces uvarum* has been described as spheroidal, ovoid, ellipsoidal, cylindrical or
 95 elongate in shape. There are also some filamentous forms. The nonfilamentous forms can occur singly, in
 96 pairs, or clusters. Different strains of this species of yeast have been determined by the size of the
 97 individual cells" (U.S. Environmental Protection Agency 1997). "Yeasts are able to grow in foods with a low
 98 pH (5.0 or lower) and in the presence of sugars, organic acids and other easily metabolized carbon sources"
 99 (Kurtzman, 2006), and they have a very high tolerance to the presence of "high sucrose, ethanol, acetic acid,
 100 sorbic acid, benzoic acid and sulfur dioxide" (Dubey, Maheshwari and Saravanamurthu 2010). Yeast
 101 produce many types of enzymes, including invertase, β -glycosidase, alcohol dehydrogenase,
 102 glyceraldehyde-3-phosphate dehydrogenase and hexokinase (Dubey, Maheshwari and Saravanamurthu
 103 2010).

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105 **Specific Uses of the Substance:**

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107 *Baker's Yeast*

108 Strains of yeast that are used as leavening agents from the production of CO₂ are referred to as baker's
 109 yeast (Dubey, Maheshwari and Saravanamurthu 2010). Different varieties of baker's yeast are available for
 110 use in both commercial bakeries and for home use. *Saccharomyces exiguus* "is a wild yeast found on plants,
 111 fruits and grains that is occasionally used for baking" (Dubey, Maheshwari and Saravanamurthu 2010).
 112 Active dry yeast, which contains a single strain of *Saccharomyces cerevisiae*, is used in the production of
 113 leavened bread (Bekatorou, Psarianos and Koutinas 2006). Inactive dry yeast is used solely for adding
 114 flavor or the "conditioning of dough properties" without leavening bread or requiring rehydration for
 115 activation (Bekatorou, Psarianos and Koutinas 2006). The particular strains of *Saccharomyces cerevisiae* that
 116 are used in baking produce large quantities of CO₂, "tolerate high-levels of sucrose, endure freeze-thawing
 117 stress, and rapidly utilize maltose." Additionally, baker's yeast lacks the enzyme α -galactosidase, unlike

118 brewer's yeast, which allows melibiase to be broken down². *Torulasporea delbrueckii* is used in frozen dough
119 for its high tolerance to the freezing/thawing process (Kurtzman, Fell and Boekhout 2011).

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121 *Brewer's Yeast*

122 Strains of yeast which include the enzyme α -galactosidase are used in the anaerobic fermentation process,
123 which converts sugar into ethanol, and are commonly referred to as brewer's yeast (Kurtzman, Fell and
124 Boekhout 2011). Alcoholic beverages for which brewer's yeast is responsible are split into two categories:
125 fermented (beer and wine), and distilled (spirits and liqueurs) (Soccol, Pandey and Larroche 2013). .

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127 *Saccharomyces uvarum* and *Saccharomyces cerevisiae* are both used in the fermentation process for a variety of
128 alcoholic beverages (Bekatorou, Psarianos and Koutinas 2006). *Saccharomyces cerevisiae*, for example, is
129 typically used "in the production of ales, porters, stouts, wheat beers, etc." while *Saccharomyces uvarum* is
130 commonly used in the production of "lager, beers like Pilsners, Bocks, American malt liquors, etc."
131 (Bekatorou, Psarianos and Koutinas 2006)."

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133 *Nutritional Yeast*

134 *Saccharomyces cerevisiae* is the most common species of yeast that, when deactivated, is consumed for its
135 nutritional content. It is generally referred to by the common name "nutritional yeast" (Dubey,
136 Maheshwari and Saravanamurthu 2010). Nutritional yeast has a high concentration of vitamins, protein,
137 and B vitamins, provides flavor, and is low in salt and fat (Dubey, Maheshwari and Saravanamurthu 2010).
138 "Nutritional yeast has nutty, cheesy and creamy flavors which makes it popular as an ingredient in cheese
139 substitutes. It is often used by vegans in place of parmesan...and as a topping for popcorn" (Dubey,
140 Maheshwari and Saravanamurthu 2010).

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142 *Probiotic Yeast*

143 Probiotics are characterized as microorganisms which exhibit beneficial effects in the "prevention and
144 treatment of specific pathological conditions" when ingested (Czerucka, Piche and Rampal 2007).
145 *Saccharomyces boulardii* has been shown to be effective in double blind studies as a probiotic (Czerucka,
146 Piche and Rampal 2007). It has been tested and shown to be effective in treating patients with diarrhea and
147 irritable bowel diseases, such as moderately advanced Crohn's disease. Additionally, this strain of yeast
148 exhibits a resistance to antibiotics, and can be used effectively by individuals who are consuming antibiotic
149 medication. *Saccharomyces boulardii* also partially or completely neutralizes toxins derived from certain
150 strains of bacteria, such as *V. cholera* and *C. difficile* (Czerucka, Piche and Rampal 2007).

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152 *Smoked Yeast*

153 Yeast which has been smoked primarily to increase its palatability is commonly called smoked yeast
154 (Freshel 1954). It is used both as a substitute for other foods and for direct consumption (Freshel 1954).
155 Methods for producing smoked yeast may impart flavors such as mint, chocolate, clove, cinnamon, basil,
156 and traditional smoke flavoring (Freshel 1954). Though the methods to produce these flavors exist, not all
157 flavors may currently be available to the consumer; traditional smoke flavoring is the most prevalent
158 (Freshel 1954).

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160 *Yeast Autolysate*

161 Yeast autolysate, also known under the name yeast extract, is comprised of the "water-soluble components
162 of the yeast cell, the composition of which is primarily amino acids, peptides, carbohydrates, salts" (Hassan
163 2011) and monosodium glutamate (MSG) (Dubey, Maheshwari and Saravanamurthu 2010). Yeast
164 autolysates are concentrates of the soluble components of yeast cells and are generally produced by
165 autolysis, a process by which the cell wall is induced mechanically or chemically to rupture. Nitrogen (N)
166 components and vitamins are the value of yeast extract because of their nutritional characteristics (Hassan
167 2011). Hence, yeast extract has been mainly used in the food industry, as a flavoring agent in soup, sauces,
168 gravies, stews, snack food and canned food, as well as in pet foods and cosmetic materials and as a plant

² α -Galactosidase is also known as melibiase. Melibiase is responsible for hydrolyzing melibiose, a disaccharide, into galactose and glucose (European Molecular Biology Laboratory: The European Bioinformatics Institute 2013).

169 nutrient. Other applications include vitamin and protein supplements in health foods and as a source of
170 nutrients in microbiological media (Hassan 2011). Additionally, yeast autolysate exhibits antioxidant
171 properties and stimulates the immune system, implying that it may also be used for medicinal purposes
172 (Hassan 2011). When used as a flavoring agent in organic production, yeast autolysate is considered a
173 natural flavor according to the FDA definition. Therefore, yeast autolysate could potentially be assessed
174 using either the annotation for yeast or for nonsynthetic flavors under USDA organic regulations section
175 205.605(a).

176 *Torula Yeast*

177 *Candida utilis*, a species of yeast commonly referred to as *Torula*, or *Candida* yeast, is consumed for its high
178 nutrient content, and as a meat substitute or food additive (Bekatorou, Psarianos and Koutinas 2006).
179 *Torula* yeast is produced via fermentation, “harvested, washed, thermalized³ and spray dried” (Bekatorou,
180 Psarianos and Koutinas 2006). *Torula* yeast is described as “a highly digestible and nutritious food,
181 containing more than 50% of protein (rich in lysine, threonine, valine and glutamic acid), minerals and
182 vitamins (mainly niacin, pantothenic acid and B vitamins). *Torula* yeast can also be used as a meat
183 substitute due to its slightly yeasty and meaty flavors, or as a food additive in many processed foods, in
184 seasonings, spices, sauces, soups, dips, etc. It is also used in vegetarian and diet food, in baby food, meat
185 products, dough, etc. (Bekatorou, Psarianos and Koutinas 2006).

187 *Chromium Yeast*

188 When yeast is grown in a medium fortified by chromium salts (e.g. $\text{CrCl}_3 \cdot 6\text{H}_2\text{O}$), chromium is adsorbed
189 into the yeast and ingested as a trace mineral supplement (Skogerson 1982) (Stearns 2000). *Saccharomyces*
190 *uvarum* when not fortified naturally contains low concentrations of chelated chromium at 2 to 4 $\mu\text{g/g}$ yeast
191 solids (Skogerson 1982). Studies are not conclusive, but there is some indication that chromium may not be
192 an essential trace mineral, and instead acts as a drug (Stearns 2000). The study depicted a correlation
193 between chromium and iron metabolism, where increases in Cr^{3+} led to a reduction of iron (Stearns 2000).

194 *Selenium Yeast*

195 High-selenium yeast is grown in a growth medium fortified by inorganic selenium salts (Kamel 2013). It is
196 allowed as an ingredient in “processed fruit and fruit juices, processed vegetables and vegetable juices,
197 commercial soups and soup mixes” (FDA 2013), yogurts, breads, instant cereals, breakfast and granola type
198 bars, beverages, pastas, crackers, salty snacks, pretzels and popcorn at levels of 5 to 60 mg/kg, and in
199 medical foods such that the daily intake will not exceed 19.2 mg/day (FDA 2013).

202 *Miscellaneous or Other Yeast Products*

203 Yeast glycan, which is derived from the cell wall after autolysis, is obtained via alkali extraction, a synthetic
204 process (Aleck, et al. 1975). Yeast glycan can be used as a low calorie fat substitute for specific types of food
205 “such as salad dressing, ice cream, puddings, sour cream based dips, etc.” (Aleck, et al. 1975). Yeast
206 mannoprotein, also derived from the cell wall, can be used in winemaking as an alternative to commercial
207 mannoproteins to “reduce red wine astringency and increase the smoothness and body” of wine, while
208 retaining the color (Guadalupe, Martinez and Ayestaran 2010).

209 Kombucha is a black or green tea containing sugar that has been fermented with “tea fungus,” a
210 combination of yeast and acetic acid bacteria (Battikh, Bakhrouf and Ammar 2012), that is consumed for
211 both its flavor and health benefits. “Yeast has synergistic effects when used with acetic acid bacteria in the
212 preparation of kombucha, a fermented sweetened tea” (Dubey, Maheshwari and Saravanamurthu 2010).
213 Species of yeast used in Kombucha include “*Schizosaccharomyces pombe*, *Saccharomycodes ludwigii*, *Kloeckera*
214 *apiculata*, *Saccharomyces cerevisiae*, *Zygosaccharomyces bailii*, *Torulasporea delbrueckii*, *Brettanomyces bruxellensis*,
215 *Brettanomyces lambicus*, *Brettanomyces custersii*, *Candida stellata*, and other species of *Candida* and *Pichia* have
216 been identified” (Battikh, Bakhrouf and Ammar 2012). Kombucha has been shown to exhibit antimicrobial,
217 antifungal activity (Battikh, Bakhrouf and Ammar 2012), which includes the inhibition of pathogens such
218 as “*Staphylococcus aureus*, *Shigella sonnei*, *Escherichia coli*, *Aeromonas hydrophilia*, *Yersinia enterocolitica*,
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³ Thermolysis is a process by which yeast is heated to render it inactive and incapable of fermentation (Bekatorou, Psarianos and Koutinas 2006).

221 *Pseudomonas aeruginosa, Enterobacter cloacae, Staphylococcus epidermis, Campylobacter jejuni, Salmonella*
 222 *enteritidis, Salmonella typhimurium, B. cereus, Helicobacter pylori, and Listeria monocytogenes*" (Mo, Zhu and
 223 Chen 2008).
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Table 3. Species of yeast used in various types of food (Kurtzman, Fell and Boekhout 2011).

Food	Yeast Species Used	Food	Yeast Species Used
Beers and ales	<i>Saccharomyces cerevisiae</i>	Fermented olives and cucumbers	<i>Debaryomyces spp.</i>
	<i>Saccharomyces bayanus</i>		<i>Candida spp.</i>
	<i>Saccharomyces pastorianus</i>		<i>Kluyveromyces marxianus</i>
	<i>Saccharomyces bayanus var. uvarum</i>		<i>Lachancea cidri</i>
Breads and bakery products	<i>Saccharomyces cerevisiae</i>		<i>Pichia spp.</i>
	<i>Torulaspora delbrueckii</i>		<i>Rhodotorula spp.</i>
	<i>Candida krusei (sourdough)</i>		<i>Saccharomyces spp.</i>
	<i>Candida milleri (sourdough)</i>	Kenkey (African fermented maize)	<i>Candida spp.</i>
	<i>Kazachstania exigua (sourdough)</i>		<i>Debaryomyces spp.</i>
	<i>Zygosaccharomyces rouxii</i>		<i>Kluyveromyces spp.</i>
Cachaca	<i>Saccharomyces cerevisiae</i>		<i>Saccharomyces spp.</i>
	<i>Schizosaccharomyces pombe</i>		<i>Trichosporon spp.</i>
Cheeses	<i>Debaryomyces hansenii</i>	Kimchi	<i>Candida spp.</i>
	<i>Candida spp.</i>		<i>Cryptococcus spp.</i>
	<i>Kluyveromyces marxianus</i>		<i>Debaryomyces spp.</i>
	<i>Kluyveromyces lactis</i>		<i>Saccharomycopsis spp.</i>
	<i>Yarrowia lipolytica</i>		<i>Kluyveromyces spp.</i>
	<i>Geotrichum candidum</i>		<i>Pichia spp.</i>
	Other Geotrichum spp.		<i>Rhodotorula spp.</i>
	<i>Rhodotorula spp.</i>		<i>Saccharomyces spp.</i>
	<i>Trichosporon spp.</i>	Lao Chao	<i>Saccharomycopsis fibuligera</i>
	<i>Saccharomyces cerevisiae</i>		<i>Saccharomycopsis malanga</i>
Other dairy products (e.g., kefir, yogurt, fermented milk)	<i>Kluyveromyces lactis</i>	Soy paste (Chiang; Miso)	<i>Zygosaccharomyces rouxii</i>
	<i>Kluyveromyces marxianus</i>		
	<i>Candida kefir</i>		<i>Candida spp.</i>
	<i>Candida famata</i>	Soy sauce (Jiang yu; Shoyu)	<i>Zygosaccharomyces rouxii</i>
	<i>Candida krusei</i>		<i>Candida famata</i>
	<i>Debaryomyces hansenii</i>		<i>Candida etchellsii</i>
	<i>Geotrichum candidum</i>		<i>Candida versatilis</i>
	<i>Yarrowia lipolytica</i>		<i>Debaryomyces spp.</i>
	<i>Saccharomyces cerevisiae</i>		Tea fungus

Ciders	<i>Saccharomyces cerevisiae</i>	Wines	<i>Kombuchaensis</i>
	<i>Saccharomyces bayanus</i>		<i>Candida spp.</i>
Cocoa	<i>Saccharomyces cerevisiae</i>		<i>Saccharomyces cerevisiae</i>
	<i>Hanseniaspora uvarum</i>		<i>Saccharomyces bayanus</i>
	<i>Kloeckera apiculata</i>		<i>Saccharomyces bayanus</i>
	<i>Kluyveromyces marxianus</i>		<i>var. uvarum</i>
	<i>Pichia fermentans</i>		<i>Saccharomyces kudriavezii</i>
Coffee	<i>Kluyveromyces marxianus</i>	Silage	" <i>Saccharomyces sake</i> "
	<i>Saccharomyces bayanus</i>		Other <i>Saccharomyces spp.</i>
	<i>Schizosaccharomyces spp.</i>		<i>Hanseniaspora uvarum</i>
	<i>Candida boidinii</i>		<i>Kloeckera apiculata</i>
Fermented meats and sausages	<i>Debaryomyces hansenii</i>	Probiotics	<i>Candida spp.</i>
	<i>Candida spp.</i>		<i>Cryptococcus spp.</i>
	<i>Cryptococcus spp.</i>		<i>Pichia spp.</i>
	<i>Rhodotorula spp.</i>		<i>Saccharomyces spp.</i>
	<i>Saccharomyces cerevisiae</i>		<i>Trichosporon spp.</i>
	<i>Yarrowia lipolytica</i>		<i>Saccharomyces boulardii</i>
Fermented milks	<i>Kluyveromyces spp.</i>		<i>Saccharomyces cerevisiae</i>
	<i>Candida parapsilosis</i>		<i>Kluyveromyces marxianus</i>
	<i>Candida krusei</i>		<i>Candida spp.</i>
	<i>Candida valida</i>		
	<i>Saccharomyces bayanus</i>		
	<i>Yarrowia lipolytica</i>		

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Approved Legal Uses of the Substance:

Yeast appears in FDA regulations as food additives permitted for direct addition to food for human consumption at 21CFR Chapter 1, subchapter B, part 172.896 (FDA 2013). Subchapter A of the same section outlines general provisions for direct addition to food. Dried yeast (*Saccharomyces cerevisiae* and *Sacharomyces fragilis*) and dried torula yeast (*Candida utilis*) both appear on the FDA’s list of food additives permitted for direct addition to food for human consumption, with the annotation “may be safely used in food provided the total folic acid content of the yeast does not exceed 0.04 milligram per gram of yeast” (approximately 0.008 milligram of pteroylglutamic acid per gram of yeast) (FDA 2013). A total of seven yeast products or byproducts carry GRAS notifications (FDA 2013). Three of these notices pertain to genetically modified yeasts, two pertain to yeast byproducts including baker’s yeast mannoprotein and baker’s yeast beta-glucan, and two relate to selenium yeast products (FDA 2013).

USDA

242 Yeast is included at 205.605(a) in the National Organic Program Rule allowed as ingredients in or on
243 processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”
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245 EPA

246 The EPA has identified yeast extract hydrolysate from *Saccharomyces cerevisiae* as exempt from the
247 requirement of tolerance on all food commodities when used for suppression of plant diseases (EPA
248 2004).

249 **Action of the Substance:**

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251 The action of yeast varies depending on the nature of the various end products being produced, such as
252 breads, alcoholic beverages, flavor enhancers and nutritional supplements.
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255 *Baker’s yeast*

256 In bread making, yeasts, notably strains of *Saccharomyces cerevisiae*, produce carbon dioxide gas via aerobic
257 fermentation that expands the dough during various production stages, including “ripening” and in the
258 beginning stages of baking (Cauvain 2003). In this way, the yeast acts as a leavening agent (Rose and
259 Vijayalakshmi 1993). Yeast play three major roles in bread making: to increase the volume of dough by
260 producing carbon dioxide via alcoholic fermentation of sugars present in the dough, to bring about a
261 change in structure and texture in the dough as a result of the carbon dioxide bubbles, and to add flavor to
262 the bread (Rose and Vijayalakshmi 1993).

263

264 *Brewer’s yeast*

265 The term brewer’s yeast refers both to the yeast used in the fermentation of alcoholic beverages and to the
266 nutrient rich, post-fermentation spent yeast. For the purpose of this report, the action of brewer’s yeast as
267 described below is applicable to all types of alcoholic beverages (i.e., cider, beer, wine and spirits).
268

269

270 In brewing the principle action of the yeast is the production of alcohol (Boulton and Quain 2001). While
271 cultured yeast is most often used presently, some fermentation techniques still rely on traditional methods
272 of using wild yeasts that are naturally present on fruits or processing equipment to accomplish alcoholic
273 fermentation (Watson 1993; Beech 1993). In the production of alcohol, yeast metabolize sugary wort (liquid
274 extracted from grain) and convert the wort into alcohol and carbon dioxide (Hammond 1993). The
275 unviable, spent yeast’s principle action is nutritive when separated from the spent growth media (e.g.,
276 beer) (Lodolo, et al. 2008) and, when used to manufacture yeast extracts, it is considered a raw material
277 (Vieira, et al. 2012). Normally the inactive yeast sold as brewer’s yeast is not, however, manufactured as a
278 byproduct of the brewing industry, but is produced via fermentation on enriched cane or beet molasses
279 substrate (Bekatorou, Psarianos and Koutinas 2006). Brewer’s yeast is high in vitamins and minerals such
280 as Vitamin B, zinc, chromium, iron, magnesium, folic acid, and biotin and is often sold as a supplement in
281 tablet, powders, flakes or in liquid form (Bekatorou, Psarianos and Koutinas 2006). Chromium levels are
282 also high in brewer’s yeast and may contribute to lowering of glucose levels in the body. (Mooradian, et al.
283 1994).

284

285 *Nutritional yeast*

286 Nutritional yeast contains free glutamic acid, which enhances the ability of taste buds to taste savory foods.
287 It also contains vitamin B, zinc, chromium, iron, magnesium, folic acid, and biotin (Red Star Yeast 2013).
288

289

290 *Smoked yeast*

291 Smoked yeast is used as a flavor enhancer to impart a smoke flavor similar to smoked meats (Freshel 1954)
292

293

294 *Yeast Autolysate*

295 Yeast autolysate is used as a flavor enhancer due to elevated levels of glutamic acid, a nonessential amino
acid that helps taste buds to detect savory foods. Yeast extract used for flavor enhancement can replace
glutamates and nucleotides in many processed foods (Bekatorou, Psarianos and Koutinas 2006). Yeast
autolysate used primarily as a flavor enhancer in organic foods would potentially be assessed according to

296 the listing “flavors –nonsynthetic” and not according to the “yeast” listing at §205.605(a). It is also used as
 297 growth media.

298
 299 *Probiotic yeast:*

300 Several yeast species are identified as having positive probiotic effects on the digestive tracks of humans.
 301 (Hatoum, Labrie and Fliss 2012). However, *Saccharomyces cerevisiae* var. *boulardii* is the only yeast with
 302 documented probiotic effects (Sazawal, et al. 2006). These effects include the prevention of bacterial
 303 adherence and translocation in intestinal epithelial cells, production of factors that neutralize bacterial
 304 toxins, and modulation of the host cell signaling pathway associated with pro-inflammatory response
 305 during bacterial infection (Moslehi-Jenabian, Lindegaard and Jespersen 2010).

306
 307 *Chromium yeast*

308 Chromium is identified as a component of glucose tolerance factor (GTF), a dietary ingredient required for
 309 optimal glucose utilization (Hambridge K 1974).

310
 311 *Selenium yeast*

312 Yeast grown on selenium rich substrate incorporates a large amount of selenium into its biomass (Rayman
 313 2000). High-selenium yeast is allowed as an ingredient in “processed fruit and fruit juices, processed
 314 vegetables and vegetable juices, commercial soups and soup mixes” (FDA 2013), yogurts, breads, instant
 315 cereals, breakfast and granola type bars, beverages, pastas, crackers, salty snacks, pretzels and popcorn at
 316 levels of 5 to 60 mg/kg, and in medical foods such that the daily intake will not exceed 19.2 mg/day (FDA
 317 2013).

318
 319 **Combinations of the Substance:**

320
 321 While some *Saccharomyces cerevisiae* species used for beer making are not formulated with other ancillary
 322 substances (Lallemand 2010), many commercially available yeasts are formulated with other ingredients.
 323 Ancillary ingredients are those ingredients (e.g. carriers, stabilizers and antioxidants) that are combined
 324 with the “active” ingredient or substance listed on the National List to provide a *necessary* technical effect
 325 on the National List substance. An example of such an ancillary ingredient is ascorbic acid, a National List
 326 substance listed at §205.605(b) which is added to yeast as a preservative (Lallemand Inc. 1998).

327
 328 Ancillary ingredients not appearing on the National List are routinely combined with yeast on a
 329 commercial scale. Other ingredients including water, emulsifiers and cutting oils (often soybean or cotton
 330 oil) are added to the final yeast product to aid in shaping (Bekatorou, Psarianos and Koutinas 2006;
 331 Lallemand Inc. 1996). These emulsifiers are added to the final yeast cake product to impart a white,
 332 creamy appearance and to inhibit water spotting on yeast cakes (Office of Air Quality Planning and
 333 Standards 1995; Lallemand Inc. 1996). The small amount of oil used is added to extrude, or to force the
 334 yeast out of nozzles to form ribbons of yeast cake (Office of Air Quality Planning and Standards 1995).

335
 336 While the specific emulsifiers used are often unidentified in literature, sorbitan monostearate (E Number
 337 E491), sorbitan tristearate (E Number E 492) sorbitan monolaurate (E Number 493), sorbitan monooleate (E
 338 number 494), and sorbitan monopalmitate (E Number 495) are identified as emulsifiers used to formulate
 339 dry yeast and yeast for baking (Fermentis 2012; European Food Emulsifier Manufacturers' Association
 340 2013).

341
 342 **Table 4.** Emulsifiers used in yeast for baking (European Food Emulsifier Manufacturers' Association 2013)

Substances	Manufacturing process
Sorbitan monostearate (E491) and sorbitan tristearate (E492)	Manufactured through the esterification of sorbitol with commercial stearic acid derived from food fats and oils
Sorbitan monolaurate (E493)	Manufactured though the esterification of sorbitol with lauric acid derived from food fats and oils

Sorbitan monooleate (E494)	Manufactured through the esterification of sorbitol with commercial oleic acid derived from food fats and oils
Sorbitan monopalmitate (E494)	Manufactured by the esterification of sorbitol with commercial palmitic acid derived from food fats and oils

343
 344 In addition to emulsifiers, ascorbic acid (mentioned above) and antioxidants are also added depending on
 345 the type of yeast product produced (Lallemand Inc. 1998). Such antioxidants include butylated
 346 hydroxyanisole (BHA), butylated hydroxytoluene (BHT), and propyl gallate (PG) (Ackerman and Pomper
 347 1969; FDA 2013). Furthermore, various materials are identified by the FDA as permitted additives in yeast
 348 manufacturing and are included in Table 5.

349
 350 **Table 5.** Materials identified by FDA as secondary direct food additives permitted in food for human
 351 consumption under Subpart D-specific usage additives at 21 CFR §173.340

Substances	Limitations	Function
Aluminum stearate	As defined in §172.863 of this chapter.	Component of defoaming agent
Butyl stearate		Component of defoaming agent
BHA	As an antioxidant, not to exceed 0.1 percent by weight of defoamer.	Component of defoaming agent
BHT	Do.	Component of defoaming agent
Calcium stearate	As defined in §172.863 of this chapter.	Component of defoaming agent
Fatty acids	As defined in 172.860 of this chapter.	Component of defoaming agent
Formaldehyde	As a preservative.	Component of defoaming agent (preservative)
Hydroxylated lecithin	As defined in 172.814 of this chapter.	Component of defoaming agent
Isopropyl alcohol		Component of defoaming agent
Magnesium stearate	As defined in 172.863 of this chapter.	Component of defoaming agent
Mineral oil: Conforming with 172.878 of this chapter	Not more than 150 ppm in yeast, measured as hydrocarbons.	Component of defoaming agent
Odorless light petroleum hydrocarbons: Conforming with 172.884 of this chapter		Component of defoaming agent
Petrolatum: Conforming with 172.880 of this chapter		Component of defoaming agent
Petroleum wax: Conforming with 172.886 of this chapter		Component of defoaming agent
Petroleum wax, synthetic		Component of defoaming agent
Polyethylene glycol (400)dioleate: Conforming with 172.820(a)(2) of this chapter and providing the oleic acid used in the production of this substance complies with 172.860 or 172.862 of this chapter	As an emulsifier not to exceed 10 percent by weight of defoamer formulation.	Component of defoaming agent

Synthetic isoparaffinic petroleum hydrocarbons: Conforming with 172.882 of this chapter		Component of defoaming agent
Oleic acid derived from tall oil fatty acids	Complying with 172.862 of this chapter.	Component of defoaming agent
Oxystearin	As defined in 172.818 of this chapter.	Component of defoaming agent
Polyoxyethylene (600) dioleate		Component of defoaming agent
Polyoxyethylene (600) monoricinoleate		Component of defoaming agent
Polypropylene glycol	Molecular weight range, 1,200-3,000.	Component of defoaming agent
Polysorbate 80	As defined in 172.840 of this chapter.	Component of defoaming agent
Potassium stearate	As defined in 172.863 of this chapter.	Component of defoaming agent
Propylene glycol mono- and diesters of fats and fatty acids	As defined in 172.856 of this chapter.	Component of defoaming agent
Soybean oil fatty acids, hydroxylated		Component of defoaming agent
Tallow, hydrogenated, oxidized or sulfated		Component of defoaming agent
Tallow alcohol, hydrogenated		Component of defoaming agent

352

353

Status

354

355 **Historic Use:**

356

357 Yeast has been used in the production of wine, beer, and bread for thousands of years, with the oldest
 358 known remains of wine dated at over 7,000 years old (Alba-Lois and Segal-Kischinevzky 2010). Mead, also
 359 known as honey wine, was made in Asia between 1700 and 1100 BC, as well as in Europe and the Middle
 360 East. "In Egypt, Babylon, Rome, and China, people produced wine from grapes and beer from malted
 361 barley. In South America, people produced *chicha* from grains or fruits, mainly maize; while in North
 362 America, people made *octli* (now known as "pulque") from agave, a type of cactus" (Alba-Lois and Segal-
 363 Kischinevzky 2010).

364

365 Prior to Louis Pasteur, a French chemist, it was unknown what process or reactions were responsible for
 366 the formation of fermented beverages. In 1860, Pasteur discovered that live yeast cells actively convert
 367 glucose into ethanol. Additionally, Pasteur "demonstrated that only microorganisms are capable of
 368 converting sugars into alcohol from grape juice," and that this process occurs under anaerobic conditions
 369 (Alba-Lois and Segal-Kischinevzky 2010).

370

371 In the past decade, hundreds of strains of *Saccharomyces cerevisiae* have been isolated from around the
 372 world for the purposes of taxonomic studies. These studies identify a high degree of genetic diversity in
 373 the strains of yeast used in different regions of the world; many strains of yeast are localized, or present
 374 only in certain regions of the world (Table 2) (Cornuet, Karst and Legras 2007). Thus, when a baker claims
 375 the yeast used in their fermentation is exclusively found in one micro-region of the world, this may be
 376 plausible; however, genetic diversity must be verified through genetic tests and taxonomic study.

377

378 Technical Advisory Panel (TAP) Reports were written on baker's, brewer's, autolysate, nutritional, and
 379 smoked yeast in 1995. These TAP Reports were presented later that year for review by the National
 380 Organic Standards Board (NOSB) as they considered these materials for inclusion in the National Organic

381 Program (NOP) National List, which was made official in 2002. In 2006, the NOSB was petitioned to move
382 yeast from §205.605(a) for nonagricultural substances to §205.606 for agricultural substances on the basis
383 that yeast is an agricultural product derived from nature, and remains unaltered under laboratory settings.
384 The petition suggested that processors be required to use organic yeast if commercially available
385 (Marroquin International Organic Commodities Services, Inc. 2006; Siegel 2010). This petition was
386 resubmitted in 2010, and the NOSB formally recommended to the NOP for "organic forms, when
387 commercially available, be required for human consumption." Yeast was not recommended to be moved to
388 §205.606 "due to concerns of the livestock industry and the debatable agricultural nature of yeast"
389 (National Organic Standards Board 2010). The NOP later completed rulemaking resulting in the current
390 annotation.

391

392 **Organic Foods Production Act, USDA Final Rule:**

393

394 Yeast and microorganisms do not appear in OFPA.

395

396 The National List includes under §205.605(a) for nonsynthetics allowed, "Yeast – When used as food or a
397 fermentation agent in products labeled as 'organic,' yeast must be organic if its end use is for human
398 consumption; nonorganic yeast may be used when organic yeast is not commercially available. Growth on
399 petrochemical substrate and sulfite waste liquor is prohibited. For smoked yeast, nonsynthetic smoke
400 flavoring process must be documented."

401

402 Genetic engineering or modification are excluded methods as per §205.2 (Electronic Code of Federal
403 Regulations: Part 205-National Organic Program 2013). §205.105(e) indicates that excluded methods are
404 prohibited in organic products.

405

406 **International**

407

408 Yeast is separately listed as an allowed substance in Canada and the European Union. No separate listing
409 for yeast is included in the regulatory bodies for the CODEX Alimentarius, Japan, and IFOAM. All
410 regulatory bodies have regulations either restricting or explicitly prohibiting the inclusion of genetically
411 modified yeast and/or microorganisms for use in organic production. Specific regulatory information from
412 each international ruling body is provided in the corresponding sections below.

413

414 *Canadian General Standards Board*

415 Table 6.4, titled "Non-organic Ingredients Not Classified as Food Additives" of the Canadian Permitted
416 Substance List states that only nonsynthetic yeast is allowed in organic handling. The types of yeast include
417 "autolysate, bakers' (may contain lecithin, obtained without the use of bleaches and organic solvents),
418 brewers', nutritional, and smoked. Non-synthetic smoke flavouring process shall be documented. Growth
419 on petrochemical substrate and sulfite waste liquor are prohibited" (Canadian General Standards Board
420 2011).

421

422 *CODEX Alimentarius*

423 Yeast in the CODEX Alimentarius does not appear separately as it does in the USDA organic regulations.
424 Under Additives and Processing Aids, "probiotics, microorganisms and enzymes are allowed." GL 32-1999
425 section 3.4 states that "any preparations of microorganisms and enzymes normally used as processing aids
426 in food processing" are permitted for use "with the exception of genetically engineered/modified
427 organisms and enzymes derived from genetically engineered/modified organisms." Additionally, Table
428 3.1 (Food additives, including carriers) makes a reference to calcium sulfate with the restriction of "cakes &
429 biscuits/soy bean products/bakers yeast".

430

431 *European Economic Community Council*

432 Article 20 allows for the labeling of organically produced yeast as organic, and states that "only organically
433 produced substrates are to be used for the production of organic yeast and organic yeast should not be
434 present in organic food or feed together with non-organic yeast" (The Council of the European Union 2008).
435 On July 10, 2008, the panel for organic yeast recommended "temporarily allowing 5% non-organic yeast

436 extract for the production of organic yeast, until organic yeast extract is available, as additional substrate
437 for the production of organic yeast as a source of nitrogen, phosphor, vitamins and minerals....The
438 availability of organic yeast extract or autolysate will be re-examined by December 31, 2013 with a view to
439 withdrawing this provision" (The Council of the European Union 2008). Substances listed in Annex VIII,
440 Section C, and materials referenced in Article 27(1)(b) and (e) of this Regulation are allowed to be used in
441 the production of yeast (The Council of the European Union 2008).

442
443 Article 9 states that genetically modified organisms (GMOs) and products produced by or from GMOs are
444 prohibited in organic production (The Council of the European Union 2007). Article 19 states that "only
445 additives, processing aids, flavorings, water, salt, preparations of micro-organisms and enzymes...may be
446 used, and only in so far as they have been authorized for use in organic production in accordance with
447 Article 21" (The Council of the European Union 2007). An additional restriction is that "products and
448 substances referred to in Article 19(2)(b) are to be found in nature and may have undergone only
449 mechanical, physical, biological, enzymatic or microbial processes, except where such products and
450 substances from such sources are not available in sufficient quantities or qualities on the market" (The
451 Council of the European Union 2007).

452
453 *Japan Agricultural Standard (JAS)*

454 The JAS Standard for Organic Processed Food does not specifically identify the allowance for yeast, in
455 Table 1: Food Additives of the Japanese Agricultural Standard for Organic Processed Foods (Japanese
456 Agricultural Standard for Organic Processed Foods (Notification No. 1606) 2005). However, the standard
457 includes the following language that indicates that microorganisms, including yeasts, are allowed: "Only
458 physical method or method using biological function (except for those produced by the recombinant DNA
459 technology; hereafter the same) shall be used for the manufacturing or processing." (Article 4: Criteria of
460 Production Methods – Management concerning manufacturing, processing, packaging, storage and other
461 processes). The term "biological function" indicates the permitted use of microorganisms such as yeasts.
462 Additionally, there are references to yeast in this and other documents, such as the allowance of calcium
463 sulfate as a "coagulating agent for confectionary, processed bean products, or bread yeast."

464
465 Questions and Answers on the Japanese Agricultural Standards for Organic Plants and Organic Processed
466 Foods Q21-15 state "since culturing materials for microorganisms are not considered to be direct
467 ingredients of organic processed foods, in cases where it is unavoidable, it is permissible to use
468 microorganisms cultured with: materials other than organic plants, organic processed foods and organic
469 livestock products" and "materials modified with recombinant DNA technology. However, should
470 culturing materials for microorganisms be used in significant quantity (5% or more) in the manufacturing
471 of processed foods, and remain there without being removed, said materials will be viewed as
472 ingredients." In summary, yeast must not be genetically modified, and when organic ingredients are
473 commercially unavailable nonorganic ingredients are allowed for use with the restrictions stated above.

474
475 *International Federation of Organic Agriculture Movements (IFOAM)*

476 Yeast is permitted in IFOAM per Section 7.2.5 which states that "preparations of micro-organisms and
477 enzymes commonly used in food processing may be used, with the exception of genetically engineered
478 micro-organisms and their products. Cultures that are prepared or multiplied in-house shall comply with
479 the requirements for the organic production of microorganisms." Section 7.2.6 states that "yeast shall be
480 included in the percentage calculations of organic ingredients by 2013." Additionally, the section titled
481 "Preparations of Micro-organisms and Enzymes for use in food processing" states, "these may be used as
482 ingredient or processing aids with approval from the control body: organic certified micro-organisms,
483 preparations of micro-organisms...." Yeast, as a microorganism, is likely interpreted in this document to
484 contain the restrictions of microorganisms, and ruling bodies may place additional restrictions where
485 necessary.

486
487

Evaluation Questions for Substances to be used in Organic Handling

488
489

490 **Evaluation Question #1: Describe the most prevalent processes used to manufacture or formulate the**
 491 **petitioned substance. Further, describe any chemical change that may occur during manufacture or**
 492 **formulation of the petitioned substance when this substance is extracted from naturally occurring plant,**
 493 **animal, or mineral sources (7 U.S.C. § 6502 (21)).**
 494

495 While yeast is a nonsynthetic material, there may be ancillary ingredients added that are not on the
 496 National List. Ancillary ingredients are discussed in detail in the Combinations of a Substance section
 497 above.
 498

499 *Baker's and brewer's yeast*

500 In general, yeast is grown using raw materials which "are usually agricultural, forestry and food waste by-
 501 products. There are two types of raw materials depending on the grown organism: conventional materials
 502 (e.g. starch, molasses, distiller's wash, whey, fruit and vegetable wastes, wood, straw, etc.) and
 503 unconventional ones (e.g. petroleum by-products, natural gas, ethanol and methanol)" (Bekatorou,
 504 Psarianos and Koutinas 2006). The terms "conventional" and "unconventional" are not to be mistaken for
 505 terms used in the organic industry such as "organic" and "conventional." The vitamins biotin, inositol,
 506 pantothenic acid, and thiamine are necessary for yeast growth, requiring growth substrate to contain these
 507 nutrients. Additional nutrients required for yeast growth are listed in Table 6, and alternate material
 508 sources in Table 7.
 509

510 **Table 6.** Nutrients required for yeast growth and example material sources (Safriet 1994; Organic
 511 Materials Review Institute (OMRI) 2013)

Raw Nutrients	Material Source
Nitrogen	Ammonium salts (Ammonium sulfate**)
	Aqueous ammonia
	Anhydrous ammonia
Potassium	Molasses
Calcium	Molasses
Phosphate	Phosphoric acid
	Phosphate salts (monoammonium phosphate**)
Magnesium	Magnesium salts (Magnesium sulfate**, magnesium chloride**)
Iron	Ferrous sulfate**
Zinc	Zinc sulfate
Copper	Copper sulfate**
Manganese	Manganese sulfate**
Molybdenum	Trace
Biotin	Cane molasses*
Inositol	Molasses
Pantothenic acid	Molasses
Thiamine	
Sugar	Corn grits
	Raisins
	Cane molasses
	Beet molasses
Amino acids**	
Pyridoxine**	

Water**	

512 * Beet molasses is deficient in biotin **OMRI Products Database

513

514 **Table 7.** Growth media feedstock for the “production of yeast using alternative, low cost waste by-
515 products of the food and agricultural industries” (Bekatorou, Psarianos and Koutinas 2006)

Microorganism	Raw material
<i>Rhodotorula rubra</i> , <i>Candida tropicalis</i> , <i>C. utilis</i> , <i>C. boidinii</i> , <i>Trichosporon cutaneum</i>	Salad oil manufacturing wastewater
<i>Candida arborea</i>	Rice straw hydrolysate
<i>Candida halophila</i> , <i>Rhodotorula glutinis</i>	Glutamate fermentation wastewater
<i>Saccharomyces cerevisiae</i>	Extracts of cabbage, watermelon, green salads and tropical fruits
<i>Candida utilis</i>	Defatted rice polishing
<i>Candida versatilis</i> , <i>Kluyveromyces lactis</i> , <i>Kluyveromyces marxianus</i>	Whey
<i>Candida utilis</i> , <i>Pichia stipitis</i> , <i>Kluyveromyces marxianus</i> , <i>Saccharomyces cerevisiae</i>	Waste Chinese cabbage
<i>Candida utilis</i>	Apple pomace
<i>Saccharomyces cerevisiae</i>	Virgin grape marc
<i>Saccharomyces sp.</i> , <i>Pichia sp.</i> , <i>Rhodotorula sp.</i> , <i>Candida sp.</i> , <i>Kluyveromyces sp.</i> and <i>Trichospora sp.</i>	Lettuce brine
<i>Candida langeronii</i>	Cane bagasse hemicellulosic hydrolyzate
<i>Torulopsis cremoris</i> , <i>Candida utilis</i> , <i>Kluyveromyces fragilis</i>	Whey
<i>Pichia guilliermondii</i>	Waste brine from kimchi production
<i>Geotrichum candidum</i>	Orange peel
<i>Candida</i> , <i>Rhodotorula</i> , <i>Leucosporidium</i>	Prawn shell waste
<i>Hansenula sp.</i>	Sugar beet stillage
<i>Candida utilis</i>	Pineapple cannery effluent
<i>Saccharomyces cerevisiae</i>	Waste date products
<i>Saccharomyces cerevisiae</i>	Hydrolyzed waste cassava
<i>Saccharomyces cerevisiae</i> , <i>Torula utilis</i> , <i>Candida lipolytica</i>	Deproteinized leaf juices of turnip, mustard, radish and cauliflower
<i>Saccharomyces cerevisiae</i>	Shrimp shell waste
<i>Candida krusei</i> , <i>Saccharomyces sp.</i>	Sorghum hydrolysate
<i>Candida rugosa</i>	Sugar beet stillage
<i>Kluyveromyces fragilis</i>	Cheese whey
<i>Cellulomonas flavigena</i> , <i>Xanthomonas sp.</i>	Sugarcane bagasse pith
<i>Candida spp. (utilis, tropicalis, parapsilosis and solani)</i>	Molasses and sugar beet pulp
<i>Kluyveromyces</i> , <i>Candida</i> , <i>Schizosaccharomyces sp.</i>	Jerusalem artichoke
<i>Pichia pinus</i>	Mango waste or methanol

516

517 Molasses is “the most widely used substrate for baker’s yeast production” (Bekatorou, Psarianos and
518 Koutinas 2006). Alternatively, whey is used exclusively as a primary substrate by specific strains of yeast in

519 the genus *Kluyveromyces* and *Candida* because "*Saccharomyces cerevisiae* lacks the enzyme β -galactosidase
520 and lactose permease. *Kluyveromyces marxianus* is the only strain used for biomass production from whey
521 on a commercial scale" (Bekatorou, Psarianos and Koutinas 2006).

522
523 At a commercial production facility, yeast is in general "fermented, harvested, concentrated and/or dried
524 and packaged" (Bekatorou, Psarianos and Koutinas 2006). The fermentation process takes place within
525 bioreactors operated at 30 °C and pH of 4.5-5, where the growth medium is present, and in an aerobic
526 environment. Fermenting under anaerobic conditions would alternatively use sugars to produce ethanol
527 and CO₂ instead of cell growth, resulting in low yeast yields (Safriet 1994). Many foreign bacteria and other
528 microorganisms grow under the same conditions as yeast. These can outcompete the desired yeast, hence
529 the requirement for sterile/aseptic procedures to be maintained throughout the production of yeast (Safriet
530 1994).

531
532 Initially, cells from a pure yeast culture are grown on a suitably adjusted mixture of molasses in the
533 laboratory, and the produced biomass is transferred aseptically into the bioreactors (Bekatorou, Psarianos
534 and Koutinas 2006). Initial growth of yeast is accomplished in a laboratory, where a small batch of pure
535 yeast is blended together with molasses malt and grown for 2 to 4 days under sterile conditions. The entire
536 mixture is then added to the first fermenter, where the yeast grows for an additional 13 to 24 hours during
537 what is called the "pure culture stage" (Safriet 1994). This yeast mixture is then transferred to a second
538 fermenter for stock fermentation to allow for larger scale growth with a matured yeast culture. This stage
539 involves regular feeding cycles and continuous aeration. Upon completion, the mixture is centrifuged to
540 separate the stock yeast for the final fermentation stage prior to commercial fermentation, which involve
541 further increased aeration, molasses, and other nutrients which are fed incrementally, which lasts from "11
542 to 15 hours." After the final feeding, "the liquid is aerated for an additional 0.5 to 1.5 hours to permit further
543 maturing of the yeast, making it more stable for refrigerated storage" (Safriet 1994).

544
545 After the yeast has reached a sufficient mass⁴, the cells are separated via centrifugation and "further
546 concentrated by a filter press or rotary vacuum filter" to produce a filter cake. "The filter cake is then
547 blended with small amounts of water, emulsifiers, and cutting oils (e.g. soybean or cottonseed oil) to form
548 the end product...which is cooled to below 8 °C" (Safriet 1994) as fresh baker's yeast, "or thermalized and
549 dried to form various types of dry yeast. The dried yeast is packed under vacuum or nitrogen gas
550 atmosphere" (Bekatorou, Psarianos and Koutinas 2006).

551
552 *Nutritional yeast*

553 The production process for nutritional yeast differs only slightly from that of baker's and brewer's yeast.
554 "Pure strains of *Saccharomyces cerevisiae* are grown on mixtures of cane and beet molasses. After the
555 fermentation process is complete, the yeast is harvested, washed, pasteurized, dried, and packaged"
556 (Adeduro and Snyder 2003). Pasteurization of yeast is common only for the production of nutritional yeast,
557 and was not identified as a manufacturing step for other types of yeast.

558
559 *Smoked yeast*

560 Smoked flavoring for products such as yeast is produced both synthetically and nonsynthetically. Smoked
561 flavoring can be produced nonsynthetically by directly exposing yeast to smoke produced from the
562 burning of wood. Alternatively, smoke comes from a smoke generator, making use of fans, which allows
563 the smoke to come into contact with water (40-140 °F), forming a liquid smoke with an acidity between 3
564 and 8% that can be applied to food products (Clifford 1963).

565
566 Smoked flavoring can be produced synthetically by passing "smoke produced by a generator through a
567 trap containing water (Freshel 1954)," filtering out undesirable ingredients, and extracting the smoke
568 flavoring with an organic solvent such as diethyl ether or ethanol for direct use on ingredients such as

⁴ The quantity of yeast produced depends on the number of fermentations the yeast goes through. Typically, this is 15,000 to 100,000 kg when a 4 fermentation stage process is used, and 7,500 to 50,000 kg for a 2 stage fermentation process. Roughly "half of the yeast manufacturing facilities" in this study used the 4 stage fermentation process. (Safriet 1994)

569 yeast (Wasserman, Method for imparting hickory smoke color and flavor to dried yeast and other food
570 powders 1971). The FDA has imposed regulations for artificial smoked flavors at 21 CFR, which states that
571 "any pyroligneous acid and other artificial smoke flavors" cannot provide any statement or declaration that
572 indicate food ingredients have been smoked, have a "true smoked flavor," or that by using artificial smoke
573 flavors as a seasoning or flavor will "result in a smoked product or one having a true smoked flavor" (US
574 FDA 2013).

575
576 *Yeast autolysate*

577 Two primary types of yeast autolysis processes are used: induced and natural (Alexandre and Guilloux-
578 Benatier 2006).

579
580 Induced autolysis is generally performed in industry, as opposed to natural autolysis, and "can be induced
581 by physical inductors (rise in temperature, alternate freezing and thawing, and osmotic pressure), chemical
582 inductors (pH, detergents, and antibiotics), or biological inductors (aeration and starvation). The autolysis
583 process can be very fast, from 48 h to 72 h, depending on the inducer" (Alexandre and Guilloux-Benatier
584 2006). Alternatively, natural autolysis is promoted by "using a mixture of killer and sensitive yeast for the
585 secondary fermentation (of wine); under these conditions a rapid death of sensitive yeast cells occurs in the
586 presence of killer strains" (Alexandre and Guilloux-Benatier 2006). Killer strains of yeast are further
587 described under Evaluation Question #9.

588
589 The mechanism for autolysis results in the degradation of the cell, including the cell walls and intracellular
590 structures. This process results in much of the cell becoming hydrolyzed, and water soluble. During the
591 final stage of cell wall degradation, "the hydrolytic products are released when their molecular masses are
592 low enough to cross pores in the cell wall." When the cell ruptures, or becomes permeable, nucleosides,
593 nucleotides, amino acids, peptides, proteins, and lipids are released, while the cell wall breaks down into
594 glucan, mannoprotein (Alexandre and Guilloux-Benatier 2006), and chitin (Kollar, et al. 1997).

595
596 **Evaluation Question #2: Discuss whether the petitioned substance is formulated or manufactured by a**
597 **chemical process, or created by naturally occurring biological processes (7 U.S.C. § 6502 (21)). Discuss**
598 **whether the petitioned substance is derived from an agricultural source.**

599
600 The primary method to produce yeast involves fermentative growth on nutrient rich media substrate
601 (Suomalainen and Oura 1971) (OMRI 2013). The media substrate varies, and was previously outlined in
602 detail in the manufacturing process section above. However, one such substrate with industrial use, and
603 which is identified in the current USDA organic regulations, is sulfite waste liquor (Suomalainen and Oura
604 1971) (USDA National Organic Program 2013). However, the nutritive components of the waste liquor vary
605 with the types of wood used in the paper making process, and the degree of cooking in the pulping process
606 (Inskeep, et al. 1951).

607
608 Since yeast is produced through fermentation and separated from residual growth media and concentrated
609 using mechanical or physical methods (i.e., filtration or centrifugation) (Borrows 1970; OMRI 2013), the
610 manufacturing process can be considered a naturally occurring biological process, and yeast can be
611 classified as nonsynthetic.

612
613 Smoked yeast is traditionally manufactured by passing smoke through dried yeast as it tumbles in a
614 rotating drum (Wasserman, Method for imparting hickory smoke color and flavor to dried yeast and other
615 food powders 1971). However, smoked yeast products are also manufactured using chemical processes
616 that leave the final smoked yeast product containing synthetic materials. In this chemical process, a liquid
617 smoke concentrate is added to a volatile solvent such as diethyl ether, which is then directly added to a dry
618 yeast powder (Wasserman, Method for imparting hickory smoke color and flavor to dried yeast and other
619 food powders 1971).

620
621 Yeast is currently listed as a nonagricultural substance at section 205.605 in the USDA organic regulations.
622 However, discussion within the organic sector concerning the classification of yeast as agricultural or
623 nonagricultural has a long history. A petition to reclassify yeast as agricultural was submitted in 2006 and

624 again in 2010 (Marroquin International Organic Commodities Services, Inc. 2006; Siegel 2010). The NOP
 625 received official public comment starting as early as 2008 regarding the reclassification of yeast and the
 626 restructuring of the processing lists in general (Rulemaking Program Management Office 2008). The public
 627 comment discussion centered on the need to clarify the definition of agricultural and nonagricultural with
 628 the possibility of amending section 205.605(a) to include nonorganic materials, or, in other words, materials
 629 that are impossible to produce organically (Wyand 2008; Rosen and Zuck 2008). The NOP responded to a
 630 2010 NOSB recommendation by finalizing Guidance Document 5014, which clarifies that yeast, even
 631 though it is classified as nonagricultural, can be certified organic; however, when used as a livestock feed
 632 ingredient is not required to carry certification (National Organic Program 2010). The NOP acted further on
 633 the NOSB recommendation in 2012 by updating the yeast listing at §205.605(a) to clarify that when yeast is
 634 used for human consumption, it must be certified organic when commercially available (USDA
 635 Agricultural Marketing Service 2012).

636
 637 **Evaluation Question #3: If the substance is a synthetic substance, provide a list of nonsynthetic or**
 638 **natural source(s) of the petitioned substance (7 CFR § 205.600 (b) (1)).**
 639

640 Yeast is considered a nonsynthetic microorganism with exceptions where yeast which has been genetically
 641 modified. A TAP Review (1995) for yeast autolysate used in processing states that it can be either synthetic
 642 or nonsynthetic, depending on whether the growth medium is organic, and whether only physical
 643 separation methods are involved. According to the NOSB Materials Database, yeast autolysate “can be
 644 made from brewer’s yeast, baker’s yeast, alcohol-grown yeast or whey-grown yeast.” Genetically modified
 645 strains of yeast are widely available and readily found in literature, including strains of *Saccharomyces*
 646 *cerevisiae* (Matsushika, Inoue and Sawayama 2009), *Candida utilis* (Ikushima, et al. 2009), and *Saccharomyces*
 647 *boulardii* (Rottiers, Vandenbroucke and Iserentant 2012), and strains which are considered GRAS.
 648

649 **Evaluation Question #4: Specify whether the petitioned substance is categorized as generally**
 650 **recognized as safe (GRAS) when used according to FDA’s good manufacturing practices (7 CFR §**
 651 **205.600 (b)(5)). If not categorized as GRAS, describe the regulatory status.**
 652

653 Yeast is listed at 7 CFR §205.605(a) nonsynthetics allowed of the USDA organic regulations. Additionally,
 654 yeast is identified at 21 CFR §170.3(o)(17) as leavening agents. 21 CFR §101.22(3) defines yeast and yeast
 655 extract as natural flavors by stating “the term natural flavor or natural flavoring means the essential oil,
 656 oleoresin, essence or extractive, protein hydrolysate, distillate, or any product of roasting, heating or
 657 enzymolysis, which contains the flavoring constituents derived from...edible yeast...” The regulatory
 658 status of specific types of yeast are outlined in Tables 8-10.
 659

660 **Table 8. Bakers yeast**

Section in 21 CFR	Identity	Species/Substance
§172.896 Not GRAS	Dried yeasts	Dried yeast (<i>Saccharomyces cerevisiae</i> and <i>Saccharomyces fragilis</i>) and dried torula yeast (<i>Candida utilis</i>)
§172.381 Not GRAS	Vitamin D2 baker’s yeast	<i>Saccharomyces cerevisiae</i> that has been exposed to ultraviolet light, producing vitamin D ₂ through a photochemical reaction with endogeneous ergosterol, a steroid found in fungi.

661
 662 **Table 9. Yeast autolysate**

Section in 21 CFR	Identity	Species/Substance
§184.1983	Baker’s yeast extract	Yeast autolysate.

§172.325 Not GRAS	Baker’s yeast protein	The insoluble proteins remaining after the cell walls of <i>Saccharomyces cerevisiae</i> have been ruptured, and whole cell walls and soluble materials have been removed.
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663
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665

Table 10. Selenium Yeast

Section in 21 CFR	Identity	Species/Substance
GRAS GRN No. 260 GRN No. 353	High-selenium yeast	Selenium yeast. Derived from <i>Saccharomyces cerevisiae</i> .

666
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675

Brewers yeast

No specific FDA regulatory citation for non-genetically modified strains.

Nutritional yeast

No specific FDA regulatory citation.

Smoked yeast

No specific FDA regulatory citation.

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Evaluation Question #5: Describe whether the primary technical function or purpose of the petitioned substance is a preservative. If so, provide a detailed description of its mechanism as a preservative (7 CFR § 205.600 (b)(4)).

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The primary technical function of yeast in food production is in the fermentation of beer, wine, and spirits; leavening of bread, flavor, nutrition, and other health benefits such as probiotics. Yeast is not identified as a preservative in literature. However, byproducts of yeast, such as ethanol, are considered preservative agents due to their prevention of mold and microbial growth (Floros and Ozdemir 2004). Additionally, baker's yeast mannoprotein is present in the GRAS Notice Inventory for use “as a stabilizing agent in wines, at levels ranging from 50 to 400 milligrams per liter, to prevent tartaric acid precipitation” (GRN 284). Specific strains of yeast, such as those within *Saccharomyces cerevisiae*, produce toxins that are lethal to other strains of *Saccharomyces cerevisiae* and which inhibit contamination of a mature yeast culture (U.S. Environmental Protection Agency 1997).

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Evaluation Question #6: Describe whether the petitioned substance will be used primarily to recreate or improve flavors, colors, textures, or nutritive values lost in processing (except when required by law), and how the substance recreates or improves any of these food/feed characteristics (7 CFR § 205.600 (b)(4)).

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Yeast is used primarily to produce alcohol and leaven breads in organic production. However, in addition to these primary uses, yeast products such as yeast extracts, nutritional yeast, and smoked yeast products are used as flavor additives in processed products by supplying a savory umami⁵ taste (Populin, et al. 2007; Nagodawithana 1992). Specific regulations allow for the use of autolyzed yeast in various canned vegetables (FDA 2013) and as a “flavoring agent and adjuvant (FDA 2000)” as defined at 21 CFR 170.3(o)(12) (FDA 2013).

Studies have also shown that certain yeast strains, the so called “red yeasts,” can be used to impart coloring to foods and also to animal (trout, salmon, lobster and chicken egg yolks) pigmentation (Lyons, Jacques and Dawson 1993; Marova, Certik and Breierova 2012).

⁵ Umami is identified as one of the five primary tastes and is imparted by glutamate, a non-essential amino acid, and ribonucleotides, including inosinate and guanylate (Umami Information Center website, 2013).

706 **Evaluation Question #7: Describe any effect or potential effect on the nutritional quality of the food or**
707 **feed when the petitioned substance is used (7 CFR § 205.600 (b)(3)).**
708

709 Nutritional benefits are provided by nutritional yeast, brewer's yeast, yeast extract and probiotic yeast
710 products. All of these products are used as health supplements for a variety of different reasons, including
711 as protein supplement, immunity enhancer, and for the control of diabetes (Moyad 2008; Rabinowitz, et al.
712 1983).

713
714 Nutritional yeast is inactivated yeast with no leavening power, has a high protein profile, and is rich in
715 amino acids and B-vitamins (Red Star Yeast 2013). Some B vitamins are also present in brewer's yeast, but
716 not in the amounts found in nutritional yeast. Brewer's yeast is, however, high in metals, including
717 chromium which may have beneficial health effects (Offenbacher, Rinko and Pi-Sunyer 1985; Simonoff, et
718 al. 1992). Yeast extract products that are used as flavoring agents, flavor enhancers, protein sources (6.1%
719 total N) and binders are composed primarily of amino acids, peptides, proteins, carbohydrates, fats and
720 salts (Food Chemicals Codex 2003). Yeast species, specifically *Saccharomyces boulardii*, are used for their
721 probiotic properties (Czerucka, Piche and Rampal 2007). This yeast strain has been shown to have probiotic
722 properties and can be used for its therapeutic effect for treatment of antibiotic-associated diarrhea and
723 recurrent intestinal infections.

724
725 An additional, indirect benefit of yeast should be considered here when assessing its effects on the
726 nutritional quality of foods. Fermentation, the digestive action of bacterial or fungal cells (yeast), can
727 positively affect the levels of nutrients in food both by increasing phytase, a phosphatase enzyme which
728 converts indigestible phosphorous into digestible forms (Türk, Carlsson and Sandberg 1996), and through
729 a process called "pre-digestion," where hard to digest compounds are broken down into more available
730 forms (Katz 2012).

731
732 **Evaluation Question #8: List any reported residues of heavy metals or other contaminants in excess of**
733 **FDA tolerances that are present or have been reported in the petitioned substance (7 CFR § 205.600**
734 **(b)(5)).**
735

Yeast or yeast byproducts are not included as part of the FDA's action levels of Mercury, Cadmium and Lead, as included in the FDA's booklet Action Levels for Poisonous or Deleterious Substances in Human Food and Animal Feed (FDA 2000). According to the Toxic Substances Control Act (TSCA), *Saccharomyces cerevisiae* is exempt from reporting (EPA 2000). The TSCA inventory does not cover chemical substances addressed by other U.S. statutes such as foods and food additives.

736
737 The Food Chemicals Codex (FCC) lists threshold levels of lead (Pb) and mercury (Hg) in yeast autolysate,
738 dried yeast and yeast extract as follows (Food Chemicals Codex 2003). Thresholds are reported as mg/kg,
739 which is equal to ppm.

740 Yeast autolysate and Yeast Extract: Pb < 2 mg/kg (ppm) and Hg < 3 mg/kg (ppm)

741
742 Dried Yeast: Pb- < 1 mg/kg (ppm), no threshold for Hg

743
744
745 Yeasts are capable of bioaccumulation of metals which can be valuable (e.g. selenium and chromium yeast)
746 but also may have potential toxicity concerns (Brady and Duncan 1994). The ability of yeast to act as a
747 bioabsorbent has metal-sequestering implications where yeast biomass has successfully removed silver,
748 gold, californium, cobalt, chromium, copper, nickel, lead, uranium, thorium and zinc from aqueous
749 solution (Wang and Chen 2009). *Saccharomyces cerevisiae* has been shown to accumulate heavy metals such
750 as cobalt and cadmium (Norris and Kelly 1977). Therefore, the growth media and water sources used for
751 commercial yeast production can significantly impact the presence of heavy metals in yeast products.

752
753 **Evaluation Question #9: Discuss and summarize findings on whether the manufacture and use of the**
754 **petitioned substance may be harmful to the environment or biodiversity (7 U.S.C. § 6517 (c) (1) (A) (i)**
755 **and 7 U.S.C. § 6517 (c) (2) (A) (i)).**

756

757 The Final Risk Assessment, an environmental and human impact study performed by the EPA for
758 *Saccharomyces cerevisiae* states that this organism is "ubiquitous in nature... and the only adverse effect to
759 the environment noted in the literature is the presence of the 'killer toxins'...composed of proteins and
760 glycoproteins" in a few strains of *Saccharomyces cerevisiae*, which is lethal to other strains of *Saccharomyces*
761 *cerevisiae* (U.S. Environmental Protection Agency 1997). These particular strains have been infected by
762 dsRNA viruses from the *Totiviridae* family, a type of mycovirus (J. and Breinig 2006).

763

764 In the manufacture of yeast, "volatile organic compound (VOC) emissions are generated as byproducts of
765 the fermentation process. The two major VOCs emitted are ethanol and acetaldehyde" (Safriet 1994). Minor
766 VOC's produced and released as part of the manufacturing process include "alcohols such as butanol,
767 isopropyl alcohol, 2,3-butanediol, organic acids and acetates. Based on emission test data, approximately 80
768 to 90 percent of total VOC emissions is ethanol, and the remaining 10 to 20 percent consists of other
769 alcohols and acetaldehyde" (Safriet 1994). Acetaldehyde is a hazardous air pollutant as defined under
770 Section 112 of the *Clean Air Act* (U.S. EPA 2013).

771

772 The Final Risk Assessment for *Saccharomyces uvarum* states that it has been "isolated from such natural sites
773 as honey, phyllosphere, on the surfaces and inside rotten fruit, and in fruit juice." Literature does not
774 indicate that this species of yeast has a negative environmental impact, pathogenic attributes, or toxin
775 production against flora or fauna. Therefore, the manufacture and use of *Saccharomyces uvarum* is unlikely
776 to be harmful to the environment" (U.S. Environmental Protection Agency 1997).

777

778 While yeast itself may be considered a minimal risk material to both the environment and in use, the
779 manufacturing process for yeast will have a negative environmental impact which can be mitigated with
780 appropriate waste management (Adeduro and Snyder 2003). This is primarily due to the emission of
781 acetaldehyde and ethanol, discussed in Evaluation Question #10.

782

783 **Evaluation Question #10: Describe and summarize any reported effects upon human health from use of**
784 **the petitioned substance (7 U.S.C. § 6517 (c) (1) (A) (i), 7 U.S.C. § 6517 (c) (2) (A) (i) and 7 U.S.C. § 6518**
785 **(m) (4)).**

786

787 Baker's yeast:

788 A Final Risk Assessment published by the U.S. Environmental Protection Agency (EPA) on *Saccharomyces*
789 *cerevisiae* states that "*Saccharomyces* are frequently recovered from the stools and throats of normal healthy
790 individuals. This indicates that humans are in constant contact with these yeasts. There are individuals
791 who may ingest large quantities of *S. cerevisiae* every day as part of a 'health food' regimen." Due to its
792 documented presence in the human gastrointestinal system, *S. cerevisiae* is not considered a pathogenic
793 microorganism according to the EPA. However, rare cases of yeast infections have occurred in individuals
794 with immunodeficiencies and those consuming antibiotics regularly for treatment. This is because
795 antibiotics kill or weaken the natural flora present in biological systems (U.S. Environmental Protection
796 Agency 1997). The Final Risk Assessment additionally states that "there have been no reports of isolates of
797 *S. cerevisiae* that produce toxins against either humans or animals."

798

799 A Final Risk Assessment published by the U.S. EPA on *Saccharomyces uvarum* states that this species is used
800 in the production of beer, wine, and ethanol and has "no reported incidences of adverse effects to
801 humans." It additionally quotes an article by Stewart and Russell (1985) stating "no other group of
802 microorganisms has been more intimately associated with the progress and wellbeing of the human race
803 than *Saccharomyces cerevisiae* and its closely related species." Humans have been exposed to *S. uvarum* in
804 production facilities and in research environments, and currently the "consumption of yeast (generic
805 application) is a common source of vitamins...a history of significant exposure with incidence of disease in
806 a nondebilitated condition contributes to a history of safe use." This Final Risk Assessment additionally
807 states that "closely related species also have a history of extensive use without significant incidence of
808 disease. The most intensely studied of those species closely related to *S. uvarum* is *S. cerevisiae*...There were
809 no reports found in the literature that indicate that *S. uvarum* produces toxins to humans or animals."

810

811 High selenium yeast has also been identified as a possible anti-carcinogen (Finley, Davis and Feng 2000).
812 Selenium (Se), an essential nutrient, is important to human biology as it is essential to enzymatic function
813 (Rayman 2000).

814
815 As referenced previously in Evaluation Question #9, acetaldehyde is a byproduct of yeast production.
816 "Acute (short term) and chronic (long term) inhalation exposure to acetaldehyde is associated with adverse
817 health effects including irritation to the eyes, skin and respiratory tract. Acetaldehyde is also a potential
818 developmental toxin and a probable human carcinogen" (Adeduro and Snyder 2003) (U.S. EPA 2012) .
819 Though yeast itself generally has either no health impacts, or beneficial health impacts with the exception
820 of individuals with weakened or compromised immune systems, the yeast production process does
821 produce byproducts such as acetaldehyde and ethanol that are documented VOCs and are harmful to
822 human health (U.S. Environmental Protection Agency 1997).

823
824 As mentioned previously, yeast autolysate contains naturally occurring monosodium glutamate (MSG).
825 The Joint FAO/WHO Expert Committee on Food Additives (JECFA), composed of "independent scientists,
826 drawn mainly from government or academic research institutes" performed a safety evaluation on MSG to
827 determine any negative health impacts (Walker and Lupien 2000). JECFA concluded that "the total dietary
828 intake of glutamates arising from their use at levels necessary to achieve the desired technological effect
829 and from their acceptable background in food do not represent a hazard to health." The Scientific
830 Committee for Food of the Commission of the European Communities (SCF) came to the same conclusion
831 with its own study as the JECFA. The Federation of American Societies for Experimental Biology (FASEB),
832 under contract with the FDA, characterized "MSG symptom complex" to include the following symptoms:
833 "a burning sensation of the back of the neck, forearms and chest; facial pressure or tightness; chest pain;
834 headache; nausea; upper body tingling and weakness; palpitation; numbness in the back of the neck, arms
835 and back; bronchospasm (in asthmatics only); and drowsiness" (Walker and Lupien 2000). The FASEB
836 report concluded that "although there was no scientifically verifiable evidence of adverse effects in most
837 individuals exposed to high levels of MSG, there is sufficient documentation to indicate that there is a
838 subgroup of presumably healthy individuals that responds, generally within 1 hour of exposure, with
839 manifestations of the MSG symptom complex when exposed to an oral dose of MSG of 3 g *in the absence of*
840 *food*" (Walker and Lupien 2000). Despite the symptoms appearing in the absence of food, it was noted that
841 the testing method of using single doses and simple solutions could not accurately predict adverse
842 reactions that may result from MSG present in food. The FDA interpreted these results, and determined
843 MSG to be safe for consumption in general and that there was no evidence to indicate that MSG in food
844 was linked to adverse reactions in the general population (Walker and Lupien 2000).

845
846 One yeast manufacturing plant identified by an EPA study pipes their ethanol waste to a water treatment
847 plant for use as fuel in a boiler to reduce atmospheric pollution (Adeduro and Snyder 2003). In the
848 atmosphere, ethanol undergoes a photochemical reaction forming a hydroxyl radical which has a half-life
849 of 5 days (United States National Library of Medicine 2004).

850
851 **Evaluation Question #11: Describe any alternative practices that would make the use of the petitioned**
852 **substance unnecessary (7 U.S.C. § 6518 (m) (6)).**

853
854
855 Wild yeasts were traditionally employed in the fermentation of alcoholic beverages (Kunkee and Bisson
856 1993; Beech 1993). However, the reliance on wild yeast varieties has given way to more standardized yeast
857 cultures to provide a more uniform fermentation and to meet health and safety concerns.

858
859 **Evaluation Question #12: Describe all natural (non-synthetic) substances or products which may be**
860 **used in place of a petitioned substance (7 U.S.C. § 6517 (c) (1) (A) (ii)).**

861
862 Natural (nonsynthetic) substances or products are available as alternatives to yeast products used as
863 flavors as identified and discussed earlier in this report. Umami is identified as one of the five primary
864 tastes, and is imparted by glutamate, a non-essential amino acid, and ribonucleotides, including inosinate
865 and guanylate (Umami Information Center website, 2013). Both glutamate and ribonucleotides occur

866 naturally in many foods such as tomato, potato, Chinese cabbage, mushroom, carrot, soybean and green
867 tea (Ninomiya 1998, Jinap 2010). Extracts of these substances could possibly be used in place of yeast
868 extract as a flavor enhancer. For example, a mushroom extract powder blended with palm oil and sprayed
869 on a maltodextrin carrier is currently marketed as an umami rich flavor enhancer (Nikken Foods 2012).
870 Other similar products that may be used in place of yeast extract include Chinese extract powder (Nikken
871 Foods 2012) and seaweed powder (Nikken Foods 2012), among others.

872
873 For the purposes of leavening in baking, sodium carbonate and sodium bicarbonate are two natural
874 (nonsynthetic) alternatives to yeast which are currently included in the USDA organic regulations at
875 §205.605(a). As alkali materials, both substances are used in combination with other substances in recipes.
876 These other substances include acidic ingredients such as citrus juice, vinegar or sour cream.
877 Other alternatives to the use of yeast for leavening include chemical leaveners. These include chemicals
878 such as ammonium carbonate and bicarbonate or baking powder (potassium acid tartrate) These
879 substances are chemical leavening agents, as opposed to yeast as a biological leavening agent, and are
880 allowed synthetic ingredients currently listed at §205.605(b) of the USDA organic regulations. The action of
881 chemical leavening agents is much the same as leavening via yeast: to aerate the dough making it light and
882 porous (Pylar 1973).

883
884 Literature has not shown any other nonsynthetic alternatives to yeast in the production of alcoholic
885 beverages.

886
887 **Evaluation Information #13: Provide a list of organic agricultural products that could be alternatives for**
888 **the petitioned substance (7 CFR § 205.600 (b) (1)).**

889
890 Organic agricultural alternatives including vegetable extracts such as mushroom extract powder, seaweed
891 extract powder and cabbage extract powder could be used as alternatives to yeast extracts for flavoring.
892 However, the commercial availability of certified organic extracts is unclear. While these extract types are
893 high in glutamate and ribonucleotides (Ninomiya 1998) (Jinap 2010) they may not provide the correct
894 flavor profile that is provided by yeast extracts.

895
896 Literature has not shown any organic agricultural alternatives to yeast used for the production of alcohol
897 or used as a leavening agent.

898
899 As part of this Technical Report, OMRI asked Accredited Certification Agents (ACAs) about their
900 experiences with certified organic yeast products. One ACA answered that they certify “yeast batch for
901 ingredient in beer production” Many ACAs have clients using certified organic yeast, nonorganic yeast
902 autolysate, and smoked yeast according to the annotation at 205.605(a). ACAs generally note that there is
903 currently not certified organic yeast available in the form, quality and quantity needed.

904
905 ACAs freely responded to OMRI and it appears form and quality are the greatest factors in finding organic
906 yeast. One ACA described the dialogue with their client over the use of organic yeast in the following way,
907 “They (the client) usually start their search by asking their current supplier about organic sources which
908 usually ends in ‘there aren't any that we know of currently’.” That ACA also identified that most of their
909 clients acknowledge there is currently only one manufacturer of organic yeast but they do not have the
910 quality or form that the client needs. ACAs recognize the difficulties in obtaining yeast in the form and
911 quality needed. Specifically, some ACAs have received negative comments on quality noting that client
912 needs such as a yeast with a long shelf life are not being met with the available organic yeasts.

913

914

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