ORGANIC TRADE ASSOCIATION

2027 Handling Sunset Materials Summaries (2025 Review)

- **Unanimous vote to renew**
- **Majority vote to renew (10-14 votes)**
- **Significant to remove (9 votes and below) / Vote to remove (4 votes and below)**

Link to OTA Handling Sunset Survey: https://www.cognitoforms.com/OTA6/NOSBSpring2025Handling

Kaolin | §205.605(a)

- **Uses in organic processing/handling**: Used as a filtering agent in juices and as an anti-caking agent.
- **OTA position:** Kaolin currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.
- **Public comments from last sunset review:** Minimal comments made at last review. Two certifiers commented that six companies list kaolin in their organic system plan.
- **Board vote at last sunset review: Unanimous vote to renew**
- **2025 Subcommittee questions:**
  1. Does kaolin appear in more Organic System Plans that it has during previous reviews? In other words, is the substance in growing or declining use?
  2. Does the community have additional information about the presence of heavy metals in some kaolin products?

Sodium bicarbonate | §205.605(a)

- **Uses in organic processing/handling**: Also known as baking soda. Used as a leavening agent in baked goods such as cookies, pancakes, and crackers; as an acidity regulator; and as neutralizer in some dairy products.
- **OTA position:** Sodium bicarbonate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.
- **Public comments from last sunset review:** Public commenters raised classification questions between the two available forms of sodium bicarbonate, one mined from Trona ore deposits, and one produced via the Solvay process, a synthetic method using brine, limestone, and ammonia to produce sodium carbonate. While some supported annotating or reclassifying the listing, no action has been taken by the Board.
- **Board vote at last sunset review: Unanimous vote to renew**
- **Subcommittee questions:**
  1. Is there any new information related to environmental concerns, human health, or use that would cause this substance to be considered for delisting?

Waxes-nonsynthetic (wood rosin) | §205.605

- **Uses in organic processing/handling**: Used as a fruit wax, primarily in citrus.

- **OTA Position:** Wood rosin currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.
- **Public comments from last sunset review:** The majority of comments supported the renewal of the listing. Some commenters suggested an annotation to limit wood rosin produced without the use of synthetic solvents.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:**
    1. Could damaged trees from hurricanes be used to produce wood rosin?

Ammonium Bicarbonate | §205.605(b) for use only as a leavening agent

- **Uses in organic processing/handling**: Allowed as a leavening agent and often used to create specific characteristic textures in baked goods. This is the only leavening agent that decomposes into water and gas during the baking process, and by doing so does not impart a flavor to the baked good as sodium bicarbonate might. Because of this unique characteristic there is no organic alternative.
- **OTA Position:** Ammonium bicarbonate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.
- **Public comments from last sunset review:** Comments were mixed with some certifiers reporting little or no use, while others reported common usage.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:** None

Ammonium Carbonate | §205.605(b) for use only as a leavening agent

- **Uses in organic processing/handling**: Allowed as a leavening agent and used in baked goods such as cookies, crackers, and breadsticks to make them lighter and crispier. As with the bicarbonate form, this is the only leavening agent that decomposes into water and gas during the baking process, and by doing so does not impart a flavor to the baked good as sodium bicarbonate might. Because of this unique characteristic there is no organic alternative.
- **OTA Position:** Ammonium carbonate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.
- **Public comments from last sunset review:** Certifiers reported little or no usage.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:** None

Calcium Phosphates (monobasic, dibasic, tribasic) | §205.605(b)

- **Uses in organic processing/handling**: Used as a leavening agent (it's a key component in baking powder) in cookies and cakes, dough conditioner, nutrient, yeast food. Monobasic and dibasic forms are used in reduced sodium baked goods. Monobasic is used as buffer, as a firming agent in canned fruits and vegetables, and as a sequestrant. Tribasic used as anticaking agent, buffer. Dibasic is used enriched flour, noodle products, and dry and cooked breakfast cereals.
- **OTA Position:** Calcium phosphates currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, are necessary for organic production, there are no viable alternatives, and they are consistent with organic handling.
- **Public comments from last sunset review:** No concerns were expressed and calcium phosphates have no substitute for their specific uses.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:**
    1. Should calcium phosphates be annotated in alignment with potassium phosphates to limit use to "made with" only?

Low-acyl gellan gum | §205.605(b)

- **Uses in organic processing/handling**: Used as an ingredient/base for vegetarian production of capsules for use in supplements and vitamins.
- **OTA Position:** Low-acyl gellan gum currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.
- **Public comments from last sunset review:** This is the first sunset review for this substance, which was added to the National List, effective December 14, 2022.
- **Board vote at last sunset review:** This is the first sunset review for this substance.
- **Subcommittee questions:**
    1. What types of organic products are low-acyl gellan (synthetic) used in compared to high-acyl gellan gum (nonsynthetic)?
    2. Are there additionally ancillaries present in low-acyl gellan gum that the board should be aware of?

Ozone | §205.605(b)

- **Uses in organic processing/handling**: Used as an equipment and produce disinfectant and fumigant to reduce/control microorganisms for food safety purposes.
- **OTA Position:** Ozone currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

- **Public comments from last sunset review:** Comments from certifiers indicated 51 operations list this material. Comments stressed the importance of ozone as disinfectant and its essentiality in reducing microbial loads on finished produce and grains.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:** None

Sodium hydroxide | §205.605(b) prohibited for use in lye peeling of fruits and vegetables

- **Uses in organic processing/handling**: Used in pretzel manufacturing to create the characteristic dark sheen and flavor, as a processing aid for cocoa manufacturing, for removing bitterness from olives, and as a processing aid in making soaps and body care products.
- **OTA Position:** Sodium hydroxide currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.
- **Public comments from last sunset review:** Commenters noted wide use and no alternatives to achieve the same consumer-expected characteristics of products like pretzels.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:** None

Carnauba wax | §205.606

- **Uses in organic processing/handling**: Used as a component in coatings for fresh fruit, candy coatings, and a base for chewing gum. It is also used as a releasing agent in manufacturing, and as an ingredient in defoamers.
- **OTA Position:** Carnauba wax currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.
- **Public comments from last sunset review:** Wide support for this listing. Some commenters expressed interest in removing as organic forms are increasingly available, however others expressed the organic forms do not provide satisfactory performance.
- **Board vote at last sunset review:** **Majority vote to renew**
- **Subcommittee questions:**
    1. What is the current organic availability of carnauba wax?

Colors derived from agricultural products | §205.606 must not be produced using synthetic solvents and carrier systems or any artificial preservative

Beet juice extract color, derived from Beta vulgaris L., except must not be produced from sugarbeets.

Beta-carotene extract, derived from carrots (Daucus carota L.) or algae (Dunaliella salina).

Black/purple carrot juice color, derived from Daucus carota L.

Chokeberry, aronia juice color, derived from Aronia arbutifolia (L.) Pers. or Aronia melanocarpa (Michx.) Elliott.

Elderberry juice color, derived from Sambucus nigra L.

Grape skin extract color, derived from Vitis vinifera L.

Purple sweet potato juice color, derived from Ipomoea batatas L. or Solanum tuberosum L.

Red cabbage extract color, derived from Brassica oleracea L.

Red radish extract color, derived from Raphanus sativus L.

Saffron extract color, derived from Crocus sativus L.

- **Uses in organic processing/handling**: Colors are added to enhance the visual appeal of food, assure color uniformity, and add color back to a food after loss in processing, or to intensify color.
- **OTA Position:** As seen in the last sunset review when 8 color listings were allowed to sunset, organic agricultural alternatives continue to emerge. Some colors may continue to meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, are necessary for organic production, there are no viable alternatives, and they are consistent with organic handling. However, there may be viable alternatives available in organic form.

  Public comments in this round will once again be critical in helping the Board determine commercial availability and the need for continued listing of the remaining colors.
- **Public comments from last sunset review:** Board discussions during the 2015 sunset review discouraged the future Board conducting the 2020 sunset review from renewing all colors due to their increasing availability in organic form. In response, the 2020 Board opted not to renew 8 color listings citing sufficient supply and/or lack of support in public comments.
- **Board vote at last sunset review:** **Unanimous vote to renew (beet juice extract, beta carotene extract, black/purple carrot juice, grape skin extract, purple potato juice, red cabbage extract, red radish extract)**; **Majority vote to renew (chokeberry-aronia juice, elderberry juice, saffron extract)**
- **Subcommittee questions:**

Which of these colors are now commercially available in organic form?
Where information about commercial availability is mixed (i.e. where some, but not all, commenters note that the organic color is available), should those colors be removed from the National List to ensure adequate market pressure to complete the transition to organic?
How essential are the colors that remain on the list? For example, could a different anthocyanin be substituted for red radish?

Are there any other specific barriers to organic transition for individual colors (e.g., grape skin extract supply is limited by constraints on organic winemaking)?

Cornstarch (native) | §205.606

- **Uses in organic processing/handling**: Allowed for use as ingredient or processing aid. Produced from specific strains of corn, it is used widely as thickener, formulation aid, bulking agent, dilutent, fluidifying agent, and moisture adsorbing agent, molding starch. Used in baking powder, confectioner's sugar, bulking agent for enzyme preparation and flavorings.
- **OTA Position:** Initial 2025 feedback from OTA members suggests supply of most forms of cornstarch may be sufficient in commercially available quantities to warrant removal from the list. The following forms have been highlighted as being **commercially available in organic** form at this time:
    - Native corn starch (cook-up); different grades of particle size and moisture content available
    - Native pregelatinized (drum dried)
    - Native pregelatinized (spray cooked)
    - Super dried (<6% moisture) and reduced micro load; for personal care & pharma applications
    - Thin boiling; for vegan gelatin replacement in confectionary industry
    - Molding starch
    - Fat replacing options; for spreadable cheese and spreads
    - Functional and clean label (cook up); for organic alternative for chemically modified starches (also freeze thaw stable)
    - Functional and Clean Label (pregelatinized); for low fat mayonnaise (cold process)
    - Corn and waxy corn options
    - Low microbiological load options
    - Various granularity grades (varying particle size)

  If you are aware of challenges in sourcing cornstarch for your technical needs, please provide specific information that includes the form of cornstarch, the application/products in which it is used, how and where you have searched for it, and any other information to illustrate the need for its continued listing.
- **Public comments from last sunset review:** Comments were mixed. While some recognized the presence & availability of organic cornstarch in certain forms, others noted there were not enough specialized organic sources to meet technical and quantity requirements. Some comments pointed to the need for an annotation to limit the listing, pointing to availability of certain forms for specific applications. The 2020 sunset vote was split, with 6 votes to remove, 9 to renew; the listing was renewed.
- **Board vote at last sunset review:** **Significant vote to remove**
- **Subcommittee questions:**

In the past 5 years, the number of suppliers of organic cornstarch has nearly tripled. Does this mean that there is a sufficient supply of organic cornstarch?
Are there *any* barriers to using organic cornstarch instead of the non-GMO based conventional cornstarch? We are

especially interested in understanding why there organic and conventionally produced cornstarch would not be completely interchangeable.
Is there sufficient supply of non-GMO based conventional cornstarch?

Glycerin | §205.606 (CAS # 56-81-5)—produced from agricultural source materials and processed using biological or mechanical/physical methods as described under §205.270(a).

- **Uses in organic processing/handling**: Used as a binder, humectant, solvent, and carrier. Commonly used in natural flavors and as an alcohol-free alternative to ethanol.
- **OTA Position:** Glycerin currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.
- **Public comments from last sunset review:** The majority of comments supported renewing the listing, noting there was no commercially available alternative at that time.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:** None

Inulin-oligofructose enriched | §205.606

- **Uses in organic processing/handling**: A non-digestible carbohydrate used in food (particularly yogurt) to improve calcium bioavailability and absorption, to serve as soluble dietary fiber or a prebiotic ingredient, and to enhance the texture and consistency of the food.
- **OTA Position:** Inulin-oligofructose enriched currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.
- **Public comments from last sunset review:** The majority of 25 comments received supported renewing, noting the substance was still in wide use and its unique functionality. Those against renewing cited commercially available sources, however they did not provide supporting documentation illustrating this.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:**

Is there adequate supply of inulin derived from organic sources?
Are there technical or other barriers to using inulin derived from organic sources in place of inulin derived from conventional sources?

Orange shellac | §205.606

- **Uses in organic processing/handling**: Used in coating of fruits and vegetables. It is also used as an ingredient in lozenges, capsules and tablets, and as a confectionery glaze on candies.

- **OTA Position:** Orange shellac currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.
- **Public comments from last sunset review:** Few public comments were received, though all supported renewing. Some commenters suggested adding an annotation requiring labeling of fruits and vegetables to which orange shellac is applied as some consumers may have an allergy to it, or they find the substance incompatible with a vegetarian diet as it is derived from the secretions of an insect.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:**
    1. Is orange shellac necessary for use in organic production (i.e. should it remain on §205.606)? Why?