



October 8, 2025

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP

Docket: AMS-NOP-25-0034

**RE: Handling Subcommittee
 2027 Sunset Handling Substances**

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Handling Subcommittee on its 2027 Sunset Handling Substances. The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

Each year, OTA initiates its sunset review with a survey of the trade to inform our position on the current year National List substances. Surveys are posted online, links to which are shared via our communication and outreach channels throughout the Spring and Fall meeting comment periods. Surveys include a brief description of uses in organic production; the OTA draft position; a brief summary of public comments from the last sunset review; an indication of the Board's vote at last sunset review (unanimous vote to renew, majority vote to renew, or significant vote to remove); and any questions posed by the Subcommittee. Prior to sharing again in the Fall, we update the survey to reflect the vote in Subcommittee. Respondents are asked to provide any additional information related to the material, its usage, and compliance with National List criteria, including whether the material should remain listed. For agricultural materials, we ask for any information regarding the availability or history of unavailability in the appropriate form, quality, or quantity of the material as well as any new information on alternative substances.

Based on those surveys, OTA provides the following comments on the 2027 Handling Substances. Please note comments specific to Colors and Cornstarch, for which we have received new information or observed market shifts since our Spring comments.



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:** Colors 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. The only concern is the availability of these colors in organic form.

Given the recent increased interest in removing artificial colors from conventional foods, including the Department of Health and Human Services and Food and Drug Administration's voluntary phase-out of synthetic colors, there has been a corresponding move toward natural colors. OTA urges caution when considering the sunset of any colors in this context. Major shifts in demand for natural colors make it impossible at this time to accurately assess the market availability of a segregated organic supply chain, and recent availability may not be indicative of future supply. Historically, in periods of tight supply, we have seen smaller segregated production, such as organic, deprioritized in favor of streamlined output to serve larger customer bases. Because this trend is relatively recent, the full impact on the supply of natural and organic colors may not be understood before rulemaking is completed should the Board recommend removal.

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, diluent, 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:
 - o Native corn starch (cook-up); different grades of particle size and moisture content available
 - o Native pregelatinized (drum dried)
 - o Native pregelatinized (spray cooked)
 - o Super dried (<6% moisture) and reduced micro load; for personal care & pharma applications
 - o Thin boiling; for vegan gelatin replacement in confectionary industry
 - o Molding starch
 - o Fat replacing options; for spreadable cheese and spreads
 - o Functional and clean label (cook up); for organic alternative for chemically modified starches (also freeze thaw stable)
 - o Functional and Clean Label (pregelatinized); for low fat mayonnaise (cold process)
 - o Corn and waxy corn options
 - o Low microbiological load options
 - o Various granularity grades (varying particle size)

While organic cornstarch may be readily available as a direct ingredient, it may not be readily available when in premix products such as baking powder. **The Board should consider retaining cornstarch on the National List for specific applications where an organic supply is not commercially available, including where it functions as part of the formulation of other National List materials (for example as a carrier or diluent).** Multi-ingredient premixes (e.g., National List substances combined with cornstarch) could present novel certification challenges, particularly if the cornstarch and National List materials are present at levels that cannot be certified. **Removing this allowance could create unnecessary burdens for small and medium-sized operations over minor but highly functional ingredient additions that play a critical role in product formulation.**

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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 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. It is not clear to OTA whether the current supply of organic glycerin is sufficient to meet all the organic marketplace's needs, although availability is increasing. However, we question why organic handling products would be held to a different standard than organic livestock, where synthetic glycerin remains listed. The NOSB should ensure a consistent and holistic approach to glycerin across organic scopes and sufficient supply is and will be available before making changes to the National List.

As a technical note, the Board's review references a commenter's claim that non-organic glycerin is connected to palm oil production and therefore deforestation. While some palm oil production has resulted in deforestation, there is also sustainable palm oil production that has not, and there are conventional sources of glycerin from non-palm feedstocks. In addition, there are organic sources of glycerin from palm sources. This comment makes an illogical connection that is not relevant to the OFPA criteria used to evaluate this substance.



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.

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.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott Rice".

Scott Rice
Sr. Director, Regulatory Affairs
Organic Trade Association

cc: Tom Chapman
Co-CEO
Organic Trade Association