October 25, 2016

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-16-0049

RE: Handling Subcommittee – Xanthan Gum

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Handling Subcommittee's Update on whether or not to reclassify Xanthan Gum.

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, representing organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

Summary of OTA's Position
OTA is unclear why NOSB decided to not take further action on the reclassification of xanthan gum given the similarities between xanthan gum and tocopherols and the quality of information provided in the Technical Review. Both food additives appear to be produced in a number of ways that could result in a final product that is either "organic," "non-synthetic," or "synthetic" depending on the source and manufacturing process used. Furthermore, it appears that the most common method used to manufacture xanthan gum creates a non-synthetic substance because the process does not alter the xanthan gum molecule either during the fermentation process or during the separation and purification process.

OTA recommends that NOSB take action and consider taking the same approach it did with tocopherols and recommend a duplicate listing on the National List, or, annotate the listing on § 205.605(b) to include wording that would require the use of a non-synthetic or organic form when commercially available. Alternatively, because we are unaware of any forms of organic xanthan gum, OTA suggests NOSB consider reclassifying xanthan gum as an allowed "non-synthetic" substance with a clarification in the proposal that synthetic forms are not allowed.

We offer the following more detailed comments:
Xanthan gum is a bi-product of a fermentation process utilizing a strain of bacteria and a carbohydrate substrate. The process used to make xanthan gum is very similar to citric acid, an allowed 'non-synthetic' on the National List. During the fermentation process, xanthan gum is produced as a microbial metabolite

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that must be separated from the fermentation broth, usually through pasteurization (to kill the bacterial cells) and separation (precipitation, pressing, centrifugation), and finally by washing it out with a salt solution. According to the Technical Review, the most commonly used manufacturing techniques do not result in chemical modifications to the xanthan gum molecule after it is produced during fermentation. It is possible that some processes that use chemical methods to separate out the xanthan gum may alter the molecule. However, most of the available sources, as cited in the Technical Review, do not use chemical methods. Accordingly, the end product would be classified as "Non-synthetic."

The Handling Subcommittee requested an updated technical report on xanthan gum, focusing on the manufacturing process, to determine if it is synthetic or non-synthetic. After reviewing the information provided, the Subcommittee determined that there appears to be more than one way to produce xanthan gum; some of the methods may be non-synthetic while others may lead to what the NOSB would classify as synthetic. Based on this determination, the Handling Subcommittee has concluded to take no further action on re-classification of xanthan gum at this time.

The information provided in the Technical Review does in fact explain in detail that xanthan gum can either be "organic," "non-synthetic," or "synthetic" depending on the source and manufacturing process used. Furthermore, it appears that the most common method used to manufacture xanthan gum does not alter the xanthan gum molecule either during the fermentation process or during the separation and purification process. OTA is uncertain why NOSB decided to not take action given the quality of information provided in the TR and the amount of information that supports the classification and availability of **non-synthetic** xanthan gum. The situation seems to be very similar to the scenario that prompted the proposal for tocopherols, a proposal that provides for multiple listings given the various ways it can be made. By not taking action, NOSB is inadvertently sending the message that the only forms of xanthan gum allowed in NOP certified products are synthetic.

OTA recommends that NOSB take action and consider taking the same or similar approach it did with tocopherols and recommend a duplicate listing on the National List, or, annotate the listing on § 205.605(b) to include wording that would require the use of a non-synthetic or organic form when commercially available. Alternatively, because we are unaware of any forms of organic xanthan gum, OTA suggests NOSB consider reclassifying xanthan gum as an allowed "non-synthetic" substance with a clarification in the proposal that synthetic forms are not allowed.

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,

Gwendolyn Wyard
Vice President, Regulatory and Technical Affairs
Organic Trade Association

cc: Laura Batcha

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