



Council for Responsible Nutrition

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April 14, 2016

Ms. Elanor Starmer
Acting Administrator
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250-0268

Re: Comment on AMS–NOP–15–0085; NOP–15–16; FR Doc. 2016–05835

Dear Ms. Starmer:

The Council for Responsible Nutrition (CRN) appreciates this opportunity to comment on the National Organic Standards Board sunset review process. Specifically, CRN strongly supports the continued use of carrageenan in organic foods, and maintaining the status quo for section 205.605(a) of the National List.

Founded in 1973 and based in Washington, D.C., CRN is the leading trade association representing dietary supplement and functional food manufacturers and ingredient suppliers. CRN member companies produce a large portion of the dietary supplements marketed in the United States and globally, including popular national brands and the store brands marketed by major supermarkets, drug stores and discount chains. These products also include those marketed through natural food stores and mainstream direct selling companies.

In total, CRN represents more than 150 companies that manufacture dietary ingredients and/or dietary supplements, or supply services to those suppliers and manufacturers. Given CRN member companies must comply with a host of federal and state regulations governing dietary supplements, it is critical that sound, proven science continues to be the basis for all regulatory review and decision-making.

This Administration and Secretary Vilsack, in particular, are strongly committed to regulatory decisions based on sound science. Regulatory agencies that have reviewed the safety of carrageenan have consistently determined carrageenan to be safe, non-carcinogenic, and lacking any hazards to human health. This scientific consensus includes the Joint Food & Agriculture Organization of the United Nations/World Health Organization Expert Committee on Food Additives¹, the U.S. Food and Drug Administration² and additional regulatory agencies from Europe, China, Japan and Brazil, among others.

¹ Summary report of the seventy-ninth meeting of the Joint Food & Agriculture Organization of the United Nations/World Health Organization Expert Committee on Food Additives, 2014. <http://www.who.int/foodsafety/publications/Summary79.pdf>

²United States Code of Federal Regulations. 21 CFR 172.620; 21 CFR 172.655; 21 CFR 172.626; 21 CFR 172.660.

Carrageenan is a natural fiber isolated from red seaweed that has been used in cooking for hundreds of years and today is safely consumed daily by many millions of people worldwide. The USDA has permitted the use of carrageenan in organic foods for more than a decade; this is important for industry and consumers because there are no alternatives that offer the same benefits and versatility as carrageenan. The availability of products that rely on carrageenan's unique technical attributes, such as organic infant formula, may be significantly impacted if the continued use of carrageenan in organic food is not allowed.

CRN strongly believes that sound science should be the basis for all regulatory review and decision-making processes. Therefore, CRN recommends that the National Organic Standards Board and the USDA strongly consider the evidence and conclusions of previous evaluations of carrageenan by authoritative public health and food safety agencies to inform its current decision.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "D. MacKay", with a checkmark-like flourish at the end.

Douglas MacKay, N.D.
Senior Vice President, Scientific & Regulatory Affairs

A handwritten signature in black ink, appearing to read "Andrea Wong", with a large, stylized flourish at the end.

Andrea Wong, Ph.D.
Vice President, Scientific & Regulatory Affairs