



## Council for Responsible Nutrition

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May 24, 2013

Attn: Toni Strother, Agricultural Marketing Specialist  
Agriculture Marketing Service  
National Organic Program  
United States Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250-0268

**Re: Docket No. AMS-NOP-11-0003: Proposed Rule: National Organic Program – 2013 Sunset (Expiration) of Allowances and Prohibitions Contained on the National List (Crops and Processing).**

The following comments on the 2013 Sunset Review of substances on the U.S. Department of Agriculture's (USDA) National List of Allowed and Prohibited Substances, published in the Federal Register on May 3, 2013 are submitted on behalf of the Council for Responsible Nutrition. The Council for Responsible Nutrition (CRN), founded in 1973 and based in Washington, D.C., is the leading trade association representing dietary supplement manufacturers and ingredient suppliers. CRN companies produce a large portion of the dietary supplements marketed in the United States and globally. Our member companies manufacture popular national brands as well as 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. CRN represents more than 100 companies that manufacture dietary ingredients and/or dietary supplements, or supply services to those suppliers and manufacturers. Our member companies are expected to comply with a host of federal and state regulations governing dietary supplements in the areas of manufacturing, marketing, quality control and safety. Our supplier and manufacturer member companies also agree to adhere to additional voluntary guidelines as well as to CRN's Code of Ethics.

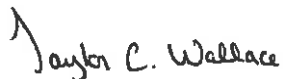
CRN's comments specifically supports the USDA's recent decision to allow the incorporation of

carrageenan in certified organic food products. CRN members utilize carrageenan in the production of functional foods and ingredients. Additionally, carrageenan is safely and appropriately used in dietary supplement tablets, liquids, capsules and/or gels.

Carrageenan is a natural soluble fiber product of red seaweed and a natural ingredient that has been used in cooking for hundreds of years. The U.S. Food and Drug Administration (FDA) has evaluated the safety of carrageenan on numerous occasions and has consistently found it to be safe for general use in all food products. Carrageenan is allowed under FDA regulations at 21 CFR 172.620 as a direct food additive and is considered safe when used in the amount necessary to function as an emulsifier, stabilizer, or thickener in foods. International bodies such as the World Health Organization (WHO) and European Food Safety Authority (EFSA) have also examined the use of carrageenan in foods on several occasions and have consistently deemed that it is safe and suitable for use. The USDA proposed rule, which allows for the incorporation of carrageenan in organic foods, is based on rigorous scientific research and is consistent within regulatory limitations of the Organic Foods Protection Act of 1990<sup>1</sup>.

CRN encourages the USDA to finalize the rule as proposed to allow the use of carrageenan in organic food products.

Respectfully submitted,



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Council for Responsible Nutrition

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<sup>1</sup> 7 U.S.C. 6501-6522