



**FLAVOR AND EXTRACT MANUFACTURERS
ASSOCIATION OF THE UNITED STATES**

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September 30, 2013

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

Subject: Docket Number AMS-NOP-13-0049; NOP-13-04

Dear Ms. Arsenault:

On behalf of the Flavor and Extract Manufacturers Association of the United States (FEMA), we submit the following comments relating to the "Notice of Meeting of the National Organic Standards Board" (78 *Fed. Reg.* 54617 September 5, 2013), specifically the Handling Subcommittee recommendation on the petition to remove glycerin from Section 205.605(b) - synthetic materials for handling.

FEMA is the national association of flavor manufacturers and represents the vast majority of flavor companies in the United States. FEMA members create flavors for use in a wide variety of food and beverage products including those certified under the National Organic Program regulations. The members of FEMA also include the suppliers of ingredients used in flavors.

FEMA Urges Continued Listing of Glycerin on Section 205.605(b) of the National List.

FEMA requests that the National Organic Standards Board (NOSB) continue the current exemption related to the National List allowing the use of "*Glycerin – produced by hydrolysis of fats and oils*" – as a nonagricultural (nonorganic) substance allowed as an ingredient in or on processed products labeled as "organic" or "made with organic" (specified ingredients or food groups.)

Glycerin can be used as a safe and suitable solvent to produce flavors that are used in a variety of food products. While glycerin is used in large amounts on an annual basis in flavors, it is present in food in exceedingly minor amounts as a constituent of compounded flavors that are used in low concentrations to flavor foods. Should glycerin be removed from Section 205.605(b) on the National List, the impact on flavor manufacturers and users would be significant from inadequate supplies resulting in increased production costs likely to be passed on to consumers.

The current National List is working. This is evidenced by the growth of organic food sales and continuing expansion of consumer interest in the development of organic products on the market that meet the standards of the National Organic Program. Furthermore, flavor ingredients have a long history of safety. In any flavor there may be several to many unique

components in minute quantities that make up a very small quantity by volume in a finished food product (parts per million or parts per billion). These individual ingredients must be demonstrated to be safe before their approval for use in any food product.

Glycerin can be an important ingredient in flavors added to many certified organic products, and will always be needed to develop flavors and provide the full flavor that is expected in today's market.

We respectfully request that glycerin be retained in Section 205.605(b) of the National List in order to maintain the current choices available in the organic food products market. We are grateful for the opportunity to comment during the Sunset Review, and we are available to provide additional information to the NOSB.

Sincerely,

A handwritten signature in black ink, appearing to read "JHC", written in a cursive style.

John H. Cox
Executive Director