

NATIONAL ORGANIC STANDARD BOARD – HANDLING COMMITTEE
WRITTEN REPORT
UPDATE ON MATERIALS USED AS FOOD CONTACT SUBSTANCES
April 15, 2004 – version 2

BACKGROUND:

On December 12, 2002 the NOP issued a policy statement clarifying under what conditions synthetic substances used as ingredients in processed food products are subject to review and recommendation by the National Organic Standards Board (NOSB). The policy states that; “handlers must include in their organic systems plan a list of all synthetic substances to be used in the production of processed products. Each synthetic substance must be identified as an ingredient or a contact substance. If identified an ingredient then it needs to be on the National List. Any substance identified as a contact substance must be accompanied by documentation that substantiates the claim.”

Prior to issuing the policy statement the NOSB recommended six handling materials for inclusion on the National List. Those include; *Activated Carbon, Ammonium Hydroxide, Cyclohexamine, Diethylaminoethanol, Octadecylamine, and Periacetic Acid*. These materials may be considered food contact substances.

ISSUE:

The industry is still confused on how to determine whether a material is an ingredient or a contact substance. The contact substance list is difficult to read and confusing on what is allowed or not allowed. In fact, handlers are being prohibited from using previously recommended materials because of the difficulty in understanding the contact substance list.

Action: The handling committee shall prioritize in their work plan to clarify the qualification of materials on the Food Contact Substance list.

STATUS:

The NOSB recommended that the following materials be added to the National List. It is our recommendation that since the following materials have already been petitioned and approved by the NOSB, that they be placed on the National List.

NOSB Recommendation	Material	Annotation
September 2002	Activated carbon	from vegetative sources only, for use as a filtering aid.
October 2001	Ammonium hydroxide	for use as a boiler water additive only with removal from the National List October 25, 2005.
October 2001	Cyclohexamine	for use as a boiler water additive for packaging sterilization only
May 2002	Diethylaminoethanol	for use as a boiler water additive for packaging sterilization only.
October 2001	Octadecylamine	for use as a boiler water additive for packaging sterilization only
November 2000	Periacetic acid	for direct food contact only in wash and/or rinse water, as a sanitizer on surfaces in contact with organic food.