



# Hakubaku Australia Pty. Ltd.

A.C.N. 072 628 016

7 Waringa Drive, Wendouree Victoria, Australia 3355  
Tel. (03) 5339 5489 Fax (03) 5339 5789

---

## Facsimile Transmission

**ATTN:** The Program Manager  
**COMPANY:** USDA/AMS/TM/NOP  
**FAX NO.:** 0011 1 202 205 7808  
**DATE:** Monday, December 17, 2007  
**FROM:** Eileen Grose  
**RE:** Petition for Buck Hull powder to be added to the USDA's National Organic Program National List  
**NO OF PAGES (Inc this one):** 6

---

To whom it may concern,

Dear Sir / Madam,

This petition has also been emailed to Robert Poole, Agricultural Marketing Specialist of USDA/AMS/TM/NOP.

We have also forwarded two copies by registered mail.

Thank you,

Eileen Grose  
Factory Manager  
Hakubaku Australia Pty. Ltd.

# Hakubaku Australia Pty. Ltd.



Program Manager,  
USDA/AMS/TM/NOP, Room 4008-So., AG Stop 0268  
1400 Independence Av., SW.,  
Washington, DC 20250

December 17th, 2007

Dear Sir or Madam.

Hakubaku Australia develops, manufactures and markets certified organic pasta and authentic Japanese dried noodles. We are accredited as producing UDSA National Organic Program compliant noodle products by NASAA: Registration Number: 3347PNOP

We are petitioning that Buck hull Powder (Black Powder) be added to the USDA's National Organic Program National List (Section 205.606) of Non-organic agricultural substances allowed in or on processed products labelled as "organic" due to commercial unavailability of a certified organic version.

The contact person for this petition is:

Eileen M. Grose  
Factory Manager  
Hakubaku Australia  
7 Waringa Drive  
Wendouree,  
Victoria  
Australia, 3355

Phone (03) 53395489  
Fax (03) 5339 5789

Email - [egrose@hakubaku.com.au](mailto:egrose@hakubaku.com.au)

Documentation to support our application is attached. This cover letter and documentation will be sent by email and fax and also two copies will be forwarded by post.

We are willing to provide any additional information necessary.

Thank You



Eileen M. Grose  
Factory Manager

# Hakubaku Australia Pty. Ltd.



## PETITION OF Non-organic Agricultural Substances to be added to Section 205.606 of the National List

### **Item A:**

Hakubaku Australia currently manufactures Buckwheat noodles from dehulled buckwheat sourced from China. Traditionally buckwheat noodles are of a dark brown colour. With dehulled buckwheat it is not possible to produce a consistent coloured noodle. Powder from the finely ground buckwheat noodle hulls is added to create a consistent colour. The percentage of this buck hull powder is 1.1%. We are requesting that this non-organic agricultural substance be added to section 205.606 of the National List as being commercially unavailable.

### **Item B:**

#### **1. Common name of substance - Buck hull Powder.**

Very finely ground black powder from the husks of buckwheat particle size under 0.13 millimeters.

#### **2. Manufacturers details**

Hakubaku  
1351 Saishoji Masuhocho Minamikomagun  
Yamanashi  
Japan  
Telephone: 81 - 556 - 22 - 8989

#### **3. Current use of Black powder**

Colouring agent in Soba ( Buckwheat) noodles.

#### **4. Use in processing**

Powder from the finely ground buckwheat noodle hulls is added to create a consistent colour. The percentage of this buck hull powder is 1.1% of the total product.

#### **5. Source of substance and description of manufacturing process.**

Buck hull powder is supplied to Hakubaku from Mongolia in China.

##### Suppliers:

Shinryo	Zenfunshoji
2-7-4 Irifune	2-7-15
Chuoku	Ningyocho Nihonbashi
Tokyo	Chuoku Tokyo
Phone : 81-3-3523-1271	Phone 81-3-3667-5131

Buckwheat grain is dehulled, the resulting husks are milled then screened, then passed through a magnetic field to eliminate any metal contamination and packed into 25 kg plastic lined paper bags and sealed.

#### **6. No previous reviews of Black Powder available**

# Hakubaku Australia Pty. Ltd.



**7. Information regarding EPA, FDA and State regulatory registrations for Black Powder does not exist**

**8. There are no assigned product numbers for Black Powder**

**9. Physical properties and chemical mode of action.**

Black powder is manufactured from buckwheat husks which are a renewable resource.

Chemical interactions, toxicity and environmental persistence, environmental impacts, effects on human health, effects on soil organisms, crops or livestock are not applicable in this application for use as a food ingredient.

**10. No MSDS is available from the manufacturer for Black Powder – however attached are specifications details from our supplier in Japan**

**11. Commercial availability**

Traditionally Japan has a large buckwheat noodle market as buckwheat products are viewed by the Japanese consumer as extremely healthy.

At present only Japan sources and mills buckwheat and buckhull powder in the commercial qualities and quantity required.

Buckwheat is a cool climate crop and due to consistent drought conditions has not been available from Australia in organic form since 2004.

**12. Petition Justification Statement**

Traditionally Soba noodles are made with wheat flour and buckwheat flour.

Previously our organic Soba noodles were made with organic wheat flour, organic buckwheat flour and black powder as a colouring. To keep our product natural and authentic we wish to continue to use the buck hull powder as the colouring agent.

Buckwheat grain is presently sourced From China and imported dehulled as AQIS regulations do not permit importation of complete seed. This grain is then milled in Australia.

As buckwheat is dehulled there is no natural colouring – thus buckwheat noodles manufactured solely with dehulled buckwheat flour appear white.

To keep buckwheat noodles authentic we source ground buckwheat powder from Japan. This is added to create consistent dark brown colouring to the buckwheat noodles. There is no roganic buckhull powder available in Japan.

There is no organically produced buckwheat available in Australia due to 10 year drought. When organic buckwheat is again available in Australia we will mill the whole grain and the use of a colouring agent will not be necessary.

**13. Confidential Business Information Statement**

There is no proprietary information contained in these documents.



Hakubaku Australia Pty.Ltd. 御中

株式会社はくばく

山梨県南巨摩郡増穂町最勝寺13町  
発行日 2007年12月14日



業務用そば粉規格書

製品名	黒粉	用途	
製造区分	<input checked="" type="checkbox"/> 一般型品 <input type="checkbox"/> 留型品	そばの色付け等	
原材料、原産国		表示食品添加物	
玄蕎麦 中国産100%		なし	

分析項目	規格値		分析手法
	夏 季 5月~10月	冬 季 11月~4月	
水分	14.0%以下	14.5%以下	近赤外分析法

※1(検査線)135℃、1時間乾燥法

衛生規格	
一般生菌数	標準平板菌数測定法
大腸菌群	デシコレット寒天培地による方法
耐熱性菌	80℃、10分加熱

製造工程図	
原料受け入れ(フレコンもしくはバラ)→精選(セパレーター、ストーナー)→減菌処理→粒度選別→脱皮(シンター、脱皮機)→粗粉碎→ストックタンク→粉碎→篩→製品タンク→再篩→充填包装→製品倉庫→出荷	

重量	20KG
保証期間	常温未開封45日
製造日又は賞味期限表	製造日での表示 2007 12 14⇒2007年12月14日製造
保管方法	匂いの強いもの・高温多湿・温度変化の激しいところは避ける

納品時の分析表の有無	分析表の添付(有・無)
備考	遺伝子組換えの有無:無し
	アレルギー表示物表示義務:有り 表示方法:そば、そば殻粉砕粉など

㈱はくばく 製粉工場 0556-22-8992

㈱はくばく 品質保証室 0556-22-8921

## Specifications of Buckwheat Flour for Industrial Use

Product Name	Black Powder
Production Type	<input checked="" type="checkbox"/> General <input type="checkbox"/> Customized

Application
Colouring of Buckwheat, Etc.

Ingredient / Origin
Non-dehulled Buckwheat / 100% from China

Indicated Food Additives
NII

Ingredient Standards				
Analyzing Item	Standard Value			Analyzing Method
Moisture Level	Summer	May-Oct	14.0% or Less	Near-Infrared Analysis
	Winter	Nov-Dec	14.5% or Less	

※1 (Analytical Curve) 135°C, 1-hour Drying Process

Sanitation Standards		
Total Bacterial Counts	—	SPC Measuring Method
Coliform Bacteria	—	Desoxycholate Agar Cultural Method
Heat-resistant Bacteria	—	90°C, Cooked for 10 minutes

Production Process	
Receipt of Ingredient (Flecon or Individual Bags) → Cleaning (Separator or de-stoner) → Bacteria Reduction → Grain Size Sorting → De-hulling (Sifter or De-hulling Machine) → Coarse Grinding → Stock Tank → Grinding → Sifting → Product Storage Tank → Re-sifting → Filling & Packing → Product Warehouse → Shipment	

Weight	20 kg
Warranty Period	45 Days (Unopened, at Room Temperature)
Production Date or Use-by Date	Production Date: 2007 12 14 → Produced on December 14, 2007
Storage	Avoid Strong Odours, High-Temperature & Humidity, and Frequent Temperature Change

Availability of Analysis Sheet at the time of Shipment		(Yes · No)
N.B.	※ Non Genetically Modified	
	※ Obligation to indicate Ingredients which may cause allergy → YES	
	※ Indicating Method: Buckwheat, Buckwheat Husk Ground Flour, Etc.	

Hakubaku Co., Ltd. Milling Factory 81-556-22-8992

Hakubaku Co., Ltd. Quality Assurance Section 81-556-22-8921