

**Formal Recommendation by the
National Organic Standards Board (NOSB)
to the National Organic Program (NOP)**

Date: May 25, 2012

Subject: Petition to add Choline to § 205.605(b) of the National List

Chair: Barry Flamm

The NOSB hereby recommends to the NOP the following:

Rulemaking Action x
Guidance Statement
Other

Statement of the Recommendation (Including Recount of Vote):

Classification Motion: Move that Choline chloride (CAS 67-48-1) and Choline bitartrate (CAS 87-67-2) are synthetic. (don't have vote count)

Moved: Zea Sonnabend **Second:** Jean Richardson
Yes: 15 **No: 0** **Abstain: 0** **Absent: 0** **Recusal: 0**

Listing Motion: 1. Move to add Choline chloride (CAS 67-48-1) and Choline bitartrate (CAS 87-67-2) to the National List 205.605(b) for use in infant formula and medical nutritional enteral products labeled organic or made with organic (specified ingredients or food group(s))

Vote: 11 yes, 4 no, 0 abstain, 0 absent, 0 recuse

Rationale Supporting Recommendation (including consistency with OFPA and NOP):

Consistent with OFPA and NOP policies, this petitioned substance was determined to be synthetic and only approved for infant formula as mandated by the FDA. The substance is deemed essential in infant formula by regulating authorities but the NOSB committee does not feel it is essential to supplement it for adults.

Committee Vote-Classification:

Moved: Zea Sonnabend **Second:** Jean Richardson
Yes: 15 **No: 0** **Abstain: 0** **Absent: 0** **Recusal: 0**

Committee Vote-Listing:**Moved:** Zea Sonnabend **Second:** Jean Richardson**Yes: 11 No: 4 Abstain: 0 Absent: 0 Recusal: 0**

Choline Amendment

Recommended Committee Action & Vote, including classification recommendation (state actual motion):

Classification Motion: Move that Choline chloride (CAS # 67-48-1) and Choline bitartrate (CAS # 87-67-2) are synthetic.

Motion by: Zea Sonnabend

Seconded by: Harold Austin

Yes: # 5 No: # 0 Absent: # 1 Abstain: # Recuse: #

Listing Motion: 1. Move to add Choline chloride (CAS # 67-48-1) and Choline bitartrate (CAS # 87-67-2) to the National List 205.605(b) for use in infant formula **and medical nutritional enteral products** labelled organic or made with organic (specified ingredients or food group(s))

Motion by: Zea Sonnabend

Seconded by: Harold Austin

Yes: # 5 No: # 0 Absent: # 1 Abstain: # Recuse: #

Listing Motion: 2. Move to add Choline chloride (CAS # 67-48-1) and Choline bitartrate (CAS # 87-67-2) to the National List 205.605(b) for use only in agricultural products other than infant formula **and medical nutritional enteral products** labeled "made with organic (specified ingredients or food group(s))" and prohibited in agricultural products labeled "organic".

Motion by: Zea Sonnabend

Seconded by: Tracy Favre

Yes: # 5 No: # 0 Absent: # 1 Abstain: # Recuse: #