

NOSB COMMITTEE RECOMMENDATION

Form NOPLIST1. Committee Transmittal to NOSB

For NOSB Meeting: March 2007

Substance: Sweet Potato Starch, bean thread form

Committee: Crops Livestock Handling Petition is for: Inclusion of Sweet Potato Starch, bean thread form on the National List § 205.606

A. Evaluation Criteria (Applicability noted for each category; Documentation attached) **Criteria Satisfied? (see B below)**

- | | | | |
|--|---|-----------------------------|---|
| 1. Impact on Humans and Environment | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. Essential & Availability Criteria | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| 3. Compatibility & Consistency | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| 4. Commercial Supply is Fragile or Potentially Unavailable as Organic (only for 606) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

B. Substance Fails Criteria Category: _____ **Comments:** _____

C. Proposed Annotation (if any): _____

Basis for annotation: To meet criteria above: _____ Other regulatory criteria: _____ Citation: _____

D. Recommended Committee Action & Vote (State Actual Motion): Recommend Sweet Potato Starch, bean thread form for listing on §205.606

Motion by: Julie Weisman Seconded: Andrea Caroe Yes: 5 No: 0 Absent: 0 Abstain: 0

| | | | | | |
|----------------|-------------------------------------|---|-------------------------------------|-------------------------|-------------------------------------|
| Crops | | Agricultural | <input checked="" type="checkbox"/> | Allowed ¹ | <input checked="" type="checkbox"/> |
| Livestock | | Non-Synthetic | | Prohibited ² | |
| Handling | <input checked="" type="checkbox"/> | Synthetic | | Rejected ³ | |
| No restriction | | Commercially Un-Available as Organic ¹ | <input checked="" type="checkbox"/> | Deferred ⁴ | |

1) Substance voted to be added as "allowed" on National List to § 205. _____ with Annotation (if any) _____

2) Substance to be added as "prohibited" on National List to § 205.606 _____ with Annotation (if any) _____

Describe why a prohibited substance: _____

3) Substance was rejected by vote for amending National List to § 205. _____ Describe why material was rejected: _____

4) Substance was recommended to be deferred because _____

_____ If follow-up needed, who will follow up _____

E. Approved by Committee Chair to transmit to NOSB:

Julie Weisman
Committee Chair

February 19, 2007
Date

NOSB EVALUATION CRITERIA FOR SUBSTANCES ADDED TO THE NATIONAL LIST

Category 1. Adverse impacts on humans or the environment?

Substance - Sweet Potato Starch, bean thread form

| Question | Yes | No | N/A¹ | Documentation (TAP; petition; regulatory agency; other) |
|---|------------|-----------|------------------------|--|
| 1. Are there adverse effects on environment from manufacture, use, or disposal? [§205.600 b.2] | | | X | This is an agricultural product. |
| 2. Is there environmental contamination during manufacture, use, misuse, or disposal? [§6518 m.3] | | | X | This is an agricultural product. |
| 3. Is the substance harmful to the environment? [§6517c(1)(A)(i);6517(c)(2)(A)i] | | X | | |
| 4. Does the substance contain List 1, 2, or 3 inerts? [§6517 c (1)(B)(ii); 205.601(m)2] | | X | | |
| 5. Is there potential for detrimental chemical interaction with other materials used? [§6518 m.1] | | X | | |
| 6. Are there adverse biological and chemical interactions in agro-ecosystem? [§6518 m.5] | | | X | This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem. |
| 7. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§6518 m.5] | | | X | This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem. |
| 8. Is there a toxic or other adverse action of the material or its breakdown products? [§6518 m.2] | | | X | This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem. |
| 9. Is there undesirable persistence or concentration of the material or breakdown products in environment?[§6518 m.2] | | | X | This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem. |
| 10. Is there any harmful effect on human health? [§6517 c (1)(A)(i) ; 6517 c(2)(A)i; §6518 m.4] | | X | | |
| 11. Is there an adverse effect on human health as defined by applicable Federal regulations? [205.600 b.3] | | X | | |
| 12. Is the substance GRAS when used according to FDA's good manufacturing practices? [§205.600 b.5] | X | | | |
| 13. Does the substance contain residues of heavy metals or other contaminants in excess of FDA tolerances? [§205.600 b.5] | | X | | |

¹If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

Category 2. Is the Substance Essential for Organic Production? Substance - Sweet Potato Starch, bean thread form

| Question | Yes | No | N/A ¹ | Documentation (TAP; petition; regulatory agency; other) |
|--|-----|----|------------------|--|
| 1. Is the substance formulated or manufactured by a chemical process? [6502 (21)] | | X | | |
| 2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)] | | X | | |
| 3. Is the substance created by naturally occurring biological processes? [6502 (21)] | X | | | |
| 4. Is there a natural source of the substance? [§205.600 b.1] | | | X | Petitioned substance is from a natural source. |
| 5. Is there an organic substitute? [§205.600 b.1] | | XX | | Petition p.3 12) describes that organic noodles made from wheat flour did not achieve the required texture and visual authenticity |
| 6. Is the substance essential for handling of organically produced agricultural products? [§205.600 b.6] | | | X | |
| 7. Is there a wholly natural substitute product? [§6517 c (1)(A)(ii)] | | | X | Petitioned substance is a wholly natural product. |
| 8. Is the substance used in handling, not synthetic, but not organically produced? [§6517 c (1)(B)(iii)] | X | | | |
| 9. Is there any alternative substances? [§6518 m.6] | | X | | See #5 above. |
| 10. Is there another practice that would make the substance unnecessary? [§6518 m.6] | | | X | |

¹If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

Category 3. Is the substance compatible with organic production practices? Substance - Sweet Potato Starch, bean thread form

| Question | Yes | No | N/A ¹ | Documentation (TAP; petition; regulatory agency; other) |
|--|-----|------|------------------|---|
| 1. Is the substance compatible with organic handling? [§205.600 b.2] | | | X | |
| 2. Is the substance consistent with organic farming and handling? [§6517 c (1)(A)(iii); 6517 c (2)(A)(ii)] | | | X | |
| 3. Is the substance compatible with a system of sustainable agriculture? [§6518 m.7] | | | X | |
| 4. Is the nutritional quality of the food maintained with the substance? [§205.600 b.3] | X | | | |
| 5. Is the primary use as a preservative? [§205.600 b.4] | | X | | |
| 6. Is the primary use to recreate or improve flavors, colors, textures, or nutritive values lost in processing (except when required by law, e.g., vitamin D in milk)? [205.600 b.4] | | \ XX | | Bean thread is not being used to create texture lost due to processing, but to create a texture that is authentic to Asian cuisine. |
| 7. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories: | | | X | |
| a. copper and sulfur compounds; | | | | |
| b. toxins derived from bacteria; | | | X | |
| c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals? | | | X | |
| d. livestock parasiticides and medicines? | | | X | |
| e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners? | | | X | |

¹If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

Category 4. Is the commercial supply of an agricultural substance as organic, fragile or potentially unavailable? [§6610, 6518, 6519, 205.2, 205.105 (d), 205.600 (c) 205.2, 205.105 (d), 205.600 (c)]

Substance - Sweet Potato Starch, bean thread form

| Question | Yes | No | N/A | Comments on Information Provided (sufficient, plausible, reasonable, thorough, complete, unknown) |
|--|------------|-----------|------------|--|
| 1. <u>Is the comparative description provided</u> as to why the non-organic form of the material /substance is necessary for use in organic handling? | XX | | | Petition page 2, 4) states that Sweet potato starch in the form of “bean thread” is necessary for the formulation of organic processed foods such as soups and pot stickers, giving them the texture of authentic Asian cooking. |
| 2. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate form to fulfill an essential function in a system of organic handling? | XX | | | Petition p.2 11) acknowledges that organic sweet potato starch is available, but not in a bean thread form. Also, that three principal suppliers of bean thread have no knowledge of it being produced in organic form. |
| 3. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate quality to fulfill an essential function in a system of organic handling? | | XX | | Petition does not contain any information to indicate that the organic sweet potato starch currently available is of inappropriate quality to produce “bean threads.” |
| 4. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate quantity to fulfill an essential function in a system of organic handling? | XX | | | See comments in 2. above . |
| 5. Does the industry information provided on material / substance non-availability as organic, include (but not limited to) the following: a. Regions of production (including factors such as climate and number of regions); | | XX | | Petition offers no information indicating a limitation in regions of production which might contribute to a limitation on organic sweet potato starch being made into “bean threads” |
| b. Number of suppliers and amount produced; | XX | | | Petition p. 2 11) named 3 suppliers of bean thread,,none of whom are aware of it being manufactured organically |
| c. Current and historical supplies related to weather events such as hurricanes, floods, and droughts that may temporarily halt production or destroy crops or supplies; | | XX | | Petition offers no information indicating a weather-related events which might contribute to a limitation on organic sweet potato starch being made into “bean threads” |
| d. Trade-related issues such as evidence of hoarding, war, trade barriers, or civil unrest that may temporarily restrict supplies; or | | XX | | There is no information in this petition which hindicates that Trade-realted issues have limited the supply of organic sweet potato starch or “bean thread” |
| e. Are there other issues which may present a challenge to a consistent supply? | | XX | | |