

NOSB COMMITTEE RECOMMENDATION

Form NOPLIST1. Committee Transmittal to NOSB

For NOSB Meeting: March 2007

Substance: Yeast

Committee: Crops Livestock Handling Petition is for: _____

Inclusion 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 checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. Compatibility & Consistency | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 4. Commercial Supply is Fragile or Potentially Unavailable as Organic (only for 606) | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" 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): There is no USDA provision or standards of yeast production within the statute or the regulation. Although the petitioner makes a case that the OFPA definition of Livestock includes “non-plant life”, we further acknowledge that OFPA does not provide provisions or production practices for this purpose. Evidence of this is found in the regulation wherer the definition of “non agricultural” includes bacteria which contradicting non-plant life being livestock (agricultural).

The Handling Committee recommends listing of yeast (autolysate, bakers, brewers, nutritional and smoked) on § 205.606 and removing yeast (autolysate, bakers, brewers, nutritional and smoked) from § 205.605(a)

Motion by: Julie Weisman Secoded: Andrea Caroe Yes: 1 No: 4 Absent: 0 Abstain: 0

Crops		Agricultural		Allowed ¹	
Livestock		Non-Synthetic		Prohibited ²	
Handling	X	Synthetic		Rejected ³	X
No restriction		Commercially Un-Available as Organic ¹		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. _____ with Annotation (if any) _____

Describe why a prohibited substance: _____

3) Substance was rejected by vote for amending National List to § 205. 606 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

February 19, 2007

NOSB EVALUATION CRITERIA FOR SUBSTANCES ADDED TO THE NATIONAL LIST

Category 1. Adverse impacts on humans or the environment? Substance - Yeast

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
1. Are there adverse effects on environment from manufacture, use, or disposal? [§205.600 b.2]		✓		TAP 1995 “ no adverse biological effect”
2. Is there environmental contamination during manufacture, use, misuse, or disposal? [§6518 m.3]		✓		TAP 1995
3. Is the substance harmful to the environment? [§6517c(1)(A)(i);6517(c)(2)(A)i]		✓		TAP 1995
4. Does the substance contain List 1, 2, or 3 inerts? [§6517 c (1)(B)(ii); 205.601(m)2]			✓	Not used in production
5. Is there potential for detrimental chemical interaction with other materials used? [§6518 m.1]		✓		TAP 1995 “no toxicity”
6. Are there adverse biological and chemical interactions in agro-ecosystem? [§6518 m.5]		✓		TAP 1995
7. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§6518 m.5]		✓		TAP 1995
8. Is there a toxic or other adverse action of the material or its breakdown products? [§6518 m.2]		✓		TAP 1995
9. Is there undesirable persistence or concentration of the material or breakdown products in environment?[§6518 m.2]		✓		TAP 1995
10. Is there any harmful effect on human health? [§6517 c (1)(A)(i) ; 6517 c(2)(A)i; §6518 m.4]		✓		TAP 1995 – However one TAP reviewer commented that it should not be consumed by people with yeast infections.
11. Is there an adverse effect on human health as defined by applicable Federal regulations? [205.600 b.3]		✓		No information specifically noted on TAP
12. Is the substance GRAS when used according to FDA’s good manufacturing practices? [§205.600 b.5]	✓			See submitted TAP 1995
13. Does the substance contain residues of heavy metals or other contaminants in excess of FDA tolerances? [§205.600 b.5]				Insufficient information

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 - Yeast

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)]		✓		TAP 1995
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)]		✓		
3. Is the substance created by naturally occurring biological processes? [6502 (21)]	✓			TAP 1995
4. Is there a natural source of the substance? [§205.600 b.1]	✓			Naturally occurring in the environment.
5. Is there an organic substitute? [§205.600 b.1]		✓		Current there are certain forms of naturally occurring yeast in the environment. However, there is no USDA provision or standards of yeast production within the statute or the regulation. Although the petitioner makes a case that the OFPA definition of Livestock includes “non-plant life”, we further acknowledge that OFPA does not provide provisions or production practices for this purpose. Evidence of this is found in the regulation wherer the definition of “non agricultural” includes bacteria which contradicting non-plant life being livestock (agricultural).
6. Is the substance essential for handling of organically produced agricultural products? [§205.600 b.6]	✓			
7. Is there a wholly natural substitute product? [§6517 c (1)(A)(ii)]			✓	No sufficient information
8. Is the substance used in handling, not synthetic, but not organically produced? [§6517 c (1)(B)(iii)]	✓			
9. Is there any alternative substances? [§6518 m.6]		✓		Not in organic form
10. Is there another practice that would make the substance unnecessary? [§6518 m.6]		✓		

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 - Yeast

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
1. Is the substance compatible with organic handling? [§205.600 b.2]	✓			
2. Is the substance consistent with organic farming and handling? [§6517 c (1)(A)(iii); 6517 c (2)(A)(ii)]	✓			
3. Is the substance compatible with a system of sustainable agriculture? [§6518 m.7]	✓			TAP 1995 see reference to organic farming systems
4. Is the nutritional quality of the food maintained with the substance? [§205.600 b.3]	✓			Certain forms of yeast are nutritional
5. Is the primary use as a preservative? [§205.600 b.4]		✓		
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]			✓	
7. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:			✓	
a. copper and sulfur compounds;			✓	
b. toxins derived from bacteria;			✓	
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?			✓	
d. livestock parasiticides and medicines?			✓	
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?			✓	

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 - Yeast

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?				
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?				
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?				
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?				
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);				
b. Number of suppliers and amount produced;				
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;				
d. Trade-related issues such as evidence of hoarding, war, trade barriers, or civil unrest that may temporarily restrict supplies; or				
e. Are there other issues which may present a challenge to a consistent supply?				