

United States Department of Agriculture
Agricultural Marketing Service | National Organic Program
Document Cover Sheet

<https://www.ams.usda.gov/rules-regulations/organic/national-list/petitioned>

Document Type:

National List Petition or Petition Update

A petition is a request to amend the USDA National Organic Program's National List of Allowed and Prohibited Substances (National List).

Any person may submit a petition to have a substance evaluated by the National Organic Standards Board (7 CFR 205.607(a)).

Guidelines for submitting a petition are available in the NOP Handbook as NOP 3011, National List Petition Guidelines.

Petitions are posted for the public on the NOP website for Petitioned Substances.

Technical Report

A technical report is developed in response to a petition to amend the National List. Reports are also developed to assist in the review of substances that are already on the National List.

Technical reports are completed by third-party contractors and are available to the public on the NOP website for Petitioned Substances.

Contractor names and dates completed are available in the report.

[Received by NOP via email on 06/11/2020]

Response to Devon Pattillo, Agricultural Marketing Specialist, letter of June 4, 2020 to Dan Rosen

Please see responses to your questions in red.

B.3 Intended or Current Use. Please clarify the use of solvents described in Section B.3, Intended or Current Use. The petition describes the use of the "zein solution substance". There are important distinctions in determinations of whether a substance is agricultural or nonagricultural in organic systems, and the Handling Subcommittee needs more information to understand the extraction process and the amount of solvent left in the finished zein product applied to food.

Zein, like food shellac, has the unique property of creating an edible film. Zein is less than .5% residual solvent. In order to solubilize zein, you need to disperse it in a solvent and water solution. Zein is not soluble in just water or just solvent, it must be a combination. Once the customer applies the zein solution to a food or pharmaceutical product, the solvent immediately flashes off (evaporates), leaving the Zein coating and no residual solvents on the underlying product.

B.4 Intended Activities and Application Rate. Under section B.4, Intended Activities and Application Rate, please clarify the practice of applying zein in a solvent and whether zein, as a corn extract, is intended for use; or whether it must always be applied to food along with solvents to be effective in food processing. If zein is always applied solubilized in a solvent, provide further information as to the ratio(s) of solvent to water to corn gluten meal.

For most applications, Zein is solubilized into a glaze, and then applied to a food or pharmaceutical. To make a glaze, using the recommended ratios, the user warms a 15% water, 85% ethanol (solvent) solution. User adds 10% zein by weight to solution to form glaze.

The user typically applies the zein coating by panning, spraying or dipping. Most applications call for a 5-10 micro coating.

B.12 Research Information. Please provide more specific, annotated references to the availability of organic and non-organic versions of zein. The petition references "Supplier A" and "Supplier B". If not considered confidential business information, please provide specific attribution and identify the information sources for information provided in the petition. Additionally, please list the companies on the Organic Integrity Database (<https://organic.ams.usda.gov/Integrity/>) that list organic CGM but are not able to provide it.

Supplier A is Ingredion and Supplier B is Grain Processing. The contacts at each company are provided below:

Wayne Davis
Ingredion
Wayne.Davis@ingredion.com
613-213-0542

Peter A. Miller
Vice President Co-Product Sales
Grain Processing Corporation
1600 Oregon Street
Muscatine, IA 52761
Office: 563.264.4841
Mobile: 563.299.6779
Fax: 563.264.4289
E-Mail: pete_miller@grainprocessing.com

I am including the results of a search done on the organic integrity database today, June 10, 2020. All of these companies were contacted and none could provide the organic Corn Gluten Meal. As you see, none are located in USA. I would like to note that when we did this search last year, before we started our application to the NOP, there were a few USA based companies that listed organic CGM. We called each one and none had the product. They are no longer listed under CGM in the Organic Integrity database.