April 14, 2016

Ms. Elanor Starmer  
Administrator, Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250-0268


Dear Administrator Starmer:

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to submit the following comments to the U.S. Department of Agriculture (USDA) Agricultural Marketing Service (AMS) regarding the National Organic Standards Board sunset review process. **Specifically, NASDA supports the continued use of carrageenan in organic foods and maintaining the status quo for section 205.605(a) of the National List of Allowed and Prohibited Substances (National List).**

NASDA represents the Commissioners, Secretaries, and Directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs including food safety, combating the spread of disease, and fostering the economic vitality of our rural communities.

Promoting their state’s agriculture producers—including organic farmers, ranchers, and value-added food producers—is a key responsibility for NASDA members and in fifteen states NASDA members serve as organic certifying agents under the National Organic Program (NOP). NASDA supports a robust NOP and related regulatory decisions that are grounded in sound science.

In studies dating back nearly a half century, regulatory agencies have consistently determined carrageenan to be safe, non-carcinogenic, and without hazards to human health. This scientific consensus includes the United Nations Food & Agriculture Organization, the World Health Organization, the U.S. Food and Drug Administration (FDA) and additional regulatory agencies from Europe, China, Japan and Brazil, among others.

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Carrageenan is a natural fiber isolated from red seaweed that has been used in cooking for hundreds of years, and today is safely consumed daily by many millions of people worldwide. Carrageenan is safely used in infant formula products, both organic and conventional, as well as countless other processed dairy, meat, and other food products. Carrageenan also provides vegetarians and vegans alternatives to gelatin. Additionally, due to carrageenan’s stability and shelf life, it has the unique benefit of minimizing waste and helping the fight against world hunger.

The USDA has wisely approved carrageenan for use in organic foods for more than a decade. As there is not a truly organic alternative, NASDA urges AMS to continue to allow America’s certified organic food producers to utilize carrageenan and refrain from removing this important product from the National List.

Sincerely,

Nathan Bowen
Director, Public Policy
NASDA