Petition for Amending the National List of the USDA's National Organic Program for inclusion of:

Cellulose Fibers

A Synthesized "Agricultural Product Not Commercially Available" used "in and on" organic food.

Submitted June 29, 2001 by Jim Pierce, Certification Coordinator, Organic Valley / CROPP Cooperative, 507 Main St. La Farge WI 54639 phone (608)625-2602 fax (608)625-4177, email jim.pierce@organicvalley.com, **website** www.organicvalley.com.

NOTE: This petition is a revision of an original petition submitted March 14th 2001 for "Peelable Regenerated Cellulose Sausage Casings". That petition was rejected June 6th 2001 on the grounds that the request was for a "formulated product".

Petitioners are required to provide the following information as applicable:

Category for inclusion on the National List:

§ 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or "Made with organic"

Common name:

- *Cellulose, Cellulose Fibers, Microcrystalline Cellulose*

Chemical Structure:

- *See attached MSDS information.*

Manufacturers name, address and telephone number

- *Viskase Corporation, 6855 West 65th Street, Chicago IL 60638. Tel. (708)4964623, Fax (708)496-4888*
- *International Fiber Corperation, 50 Bridge Street, North Tonawanda, NY 14120*
- *Tembec Inc. 33 Kipawa Rd., PO Box 3000, Temiscaming, Quebec Canada, JOZ 3RO*

List of uses, rates and applications for crops and livestock uses, mode of action for handling uses: *The following is a list of uses in the organic industry which have been discovered in researching this petition. There are probably other organic applications which the TAP review will discover that should be considered for inclusion as well.*

- *Used in formulation as a processing aid in the production of Skinless Wieners (Hotdogs). Emulsified sausage blend is stuffed into cellulose casings, smoked or otherwise cooked and peeled from the casing prior to packaging.*
- *Used as an anticaking agent at the rate of up to 2% in shredded products such as cheese*
- *Used as a filtering agent in fruit processing.*

Sources and detailed description of manufacturing procedures:

- *See attached process sheet /Flowchart.*

Summary of any previous reviews by state or private certification agencies:

- *As far as we know Organic Valley is the only manufacturer of certified organic Hotdogs. There may be organic vegetarian products on the market which I am unaware of. In February 1999 Peelable Cellulose Casings was petitioned to Oregon Tilth Certified Organic, our lead agency, prior to the introduction of the first "Certified Organic" Meat product in March 1999 following the revision of the organic laws to allow labeling of meat products.*
- *Cellulose fibers have been approved for use in shredded cheese by OTCO and QAI since 1994.*

Regulatory status with EPA, FDA or state authorities:

- *The two attached MSDS Sheets do not list any regulations. Likewise, while an internet search for Cellulose as Paper Fiber (The raw material from which casings are made) mentions a potential OSHA Air Pollution Hazard nothing specific to Cellulose Casings could be found.*

Chemical Abstract Service (CAS) number or other product number, samples of labels:

- *CAS number – (9004-34-6)*

Physical properties of the substance and chemical mode of action: including environmental impacts, interactions with other materials, toxicity and persistence, effects on human health, effects of soil organisms, crops or livestock:

- *See attached MSDSs.*

Safety information, including a MSDS (Material Safety Data Sheet) and report from National Institute of Environmental Health Studies (NIEHS):

- *MSDS Sheets are attached*
- *NIEHS A NIEHS website search using "Cellulose" revealed 26 links. Ten were devoted to Cellulose Insulation in construction where dustand fire retardant chemicals are a concern but no reference was found to the cellulose itself. Several sites mentioned Methyl Cellulose in toxicology studies of laboratory animals but no direct safety concerns could be found to food grade cellulose.*

Petition justification statement - that states why the synthetic substance is necessary, alternatives that could be used, beneficial effects to the environment, etc:

Cellulose, whether as a minor ingredient or a processing aid has been used for years by certified organic food companies. It has been a part of Organic Valley's food processing and formulation for over six years. Cellulose is used as an anticaking agent in certified organic shredded cheese and as a processing aid in our certified organic hotdogs. The cellulose fibers used in our cellulose have been thoroughly reviewed and chosen as the preferred ingredient for function, while preserving organic integrity.

Though some cheeses can be shredded and packaged without the use of any anticaking agents, most shredded cheese
packaged either for retail or manufacture will clump and become unappealing and dysfunctional. Cellulose is not added as an anticaking agent at uniform rates but on an "as needed" basis, at the lowest usage rates possible.

Organic Valley's certified organic Beef hotdogs (branded Valley's Family due to USDA label law language) were the very first USDA labeled organic meat product in history. They, along with the recently introduced chicken hotdog, are foundation products to the Valley's Family line.

Peelable Cellulose Sausage casings are the industry standard for producing skinless sausages such as hotdogs. We know of no substitute casing available and "natural casing" wieners do not fill the same market niche.

Consumer feedback has been overwhelmingly positive. We routinely receive calls and letters thanking us for offering an organic alternative for concerned parents to feed their children. Efforts are underway to introduce this

product in Schools and other foodservice applications.

As the attached documents will verify, cellulose casings are composed of naturally occurring cellulose from trees, which is extensively processed into a material similar to cellophane. These casings pose less of a problem than much of the
Plastic in which organic food is packaged. This conclusion was reached in 1999 by Oregon Tilth as the result of a similar petition review.

Some certified organic companies also use cellulose fibers as filtering agents, a subject with which this petitioner does not have any direct experience. It is my understanding
that supporting documentation and editorials, from these other companies, will be submitted in support of this petition. These letters of support will clarify and expand upon the various ways cellulose is used in the organic industry. Much of the information presented in this petition and support letters will undoubtedly pertain to multiple applications. Each interested party, working independently, will unveil helpful information that the other missed.

Commercial Confidential Information Statement - describing information that is considered to be confidential business or commercial information:

- *None of the information submitted in this report is considered confidential at this time.*

ATTACHMENT LIST

- **PETITION APPLICATION**
- **MSDS**
- **SPEC SHEETS AND SUPPORTING DECLARATIONS OF PURITY**
- **PROCESS DESCRIPTION AND FLOW CHART**
- **TECHNICAL DATA SHEET**
- **KOSHER CERTIFICATE**
- **EMAIL FROM ASSOCIATE DISCUSSING APPLICABILITY OF NOP RULE TO CELLULOSE**

INTERNATIONAL FIBER CORPORATION

[redacted]

Date Issued:	March 6, 2001
Supercedes:	November 16, 1998

Specification Sheet for JustFiber® L20 FCC

JustFiber L20 FCC meets or exceeds the monograph requirements for Powdered Cellulose as published in the Food Chemicals Codex, 4th Edition, Pages 96-97. It is formulated to improve the flow of shredded and grated cheeses when used at levels of up to 2.0%.

Chemical Properties

Assay, % Cellulose	97.0 - 102.0
pH (10% suspension)	5.0 - 7.5
Loss on Drying, %	Not More Than 7.0
Water Soluble Substances, %	Not More Than 1.5
Ash (total), %	Not More Than 0.3
Chloride, %	Not More Than 0.05
Sulfur, %	Not More Than 0.01
Heavy Metals, ppm as Lead	Not More Than 10.0

Microbiological Properties

Standard Plate Count, per g	Not More Than 1,000
Yeast and Mold, per g	Not More Than 100
Listeria (25 g sample)	Negative
Salmonella (25g sample)	Negative
E. *Coli* (25 g sample)	Negative

Physical Properties

Appearance: Fine Creamy Powder
Apparent Density: Approximately 16 lbs./ft^3

On 40-Mesh	Thru 100-Mesh	Thru 200-Mesh
LT 1%	NMT 90%	NMT 70%

Recommended Labeling: Cellulose CAS Number: 9004-34-6

Attn Gloria

SPECIFICATION SHEET
(Typical Test Data)

The grade described in this specification meets or exceeds the requirements of FCC IV monograph (March 1996, pp. 96-97)

DATE:
DATE ISSUED: 9/10/97

PRODUCT: POWDERED CELLULOSE

GRADE: JUSTFIBER® 20

BENEFITS: JustFiber® 20 powdered cellulose anti-caking agent is formulated to improve the flow of shredded and grated cheese. A level of up to 2% by weight is recommended. JustFiber® 20 is GRAS.

CHEMICAL PROPERTIES:

ASSAY (% CELLULOSE)	NLT 97
DIETARY FIBER CONTENT (% TDF, d.b.)	NLT 99
ASH (%)	NMT 0.3
PH (10% SUSPENSION)	5.0 - 7.5
HEAVY METALS, ppm as Pb	NMT 10
SULFUR (TOTAL, %)	NMT 0.01
WATER SOLUBLE SUBSTANCES (%)	NMT 1.5
CHLORIDE (%)	NMT 0.05
ARSENIC, ppm	NMT 0.1
MOISTURE (%)	NMT 7

PHYSICAL PROPERTIES:

APPEARANCE	WHITE
AVERAGE FIBER LENGTH (MICRONS)	35
BULK	130-150 CC/50 GRAM
APPARENT DENSITY	18 LBS./CU.FT.
PARTICLE SIZE:	
+40 MESH	0.0
+100 MESH	98% MAX.
-200 MESH	90% MAX.

MICROBIOLOGICAL ASSAYS:

TOTAL PLATE COUNT	NMT 500/GRAM
COLIFORMS	NMT 10/GRAM
E.COLI (in 1g)	NEGATIVE
SALMONELLA (in 100 g)	NEGATIVE
YEAST	NMT 20/GRAM
MOLD	NMT 20/GRAM
LISTERIA MONOCYTOGENES	NEGATIVE

INGREDIENT DECLARATION: POWDERED CELLULOSE

This information is presented for your consideration in the belief that it is accurate and reliable; however, no warranty either expressed or implied is made and no freedom from liability from patents, trademarks, or other limitations should be inferred.

Kelley Supply, Inc. P.O. Box 100, Abbotsford, WI 54405
Telephone 715-223-3614 Fax 715-223-6385

MSDS Material Safety Data Sheet

From: Mallinckrodt Baker, Inc.
222 Red School Lane
Phillipsburg, NJ 08865

Mallinckrodt CHEMICALS J.T.Baker

24 Hour Emergency Telephone: 908-859-2151
CHEMTREC: 1-800-424-9300

National Response in Canada
CANUTEC: 613-996-6666

Outside U.S. and Canada
Chemtrec: 703-527-3887

NOTE: CHEMTREC, CANUTEC and National Response Center emergency numbers to be used only in the event of chemical emergencies involving a spill, leak, fire, exposure or accident involving chemicals.

All non-emergency questions should be directed to Customer Service (1-800-582-2537) for assistance.

MICROCRYSTALLINE CELLULOSE

MSDS Number: C1683 --- *Effective Date: 03/24/00*

1. Product Identification

Synonyms: Cellulose; flour cellulose
CAS No.: 9004-34-6
Molecular Weight: Not applicable.
Chemical Formula: (C6H10O5)x
Product Codes:
J.T. Baker: 1525, 1528, 1529
Mallinckrodt: H139

2. Composition/Information on Ingredients

Ingredient	CAS No	Percent	Hazardous
Cellulose	9004-34-6	100%	Yes

3. Hazards Identification

Emergency Overview

WARNING! POWDERED MATERIAL MAY FORM EXPLOSIVE DUST-AIR MIXTURES. COMBUSTIBLE SOLID.

J.T. Baker SAF-T-DATA(tm) Ratings (Provided here for your convenience)

Health Rating: 0 - None
Flammability Rating: 1 - Slight
Reactivity Rating: 0 - None
Contact Rating: 0 - None
Lab Protective Equip: GOGGLES; LAB COAT; CLASS A EXTINGUISHER
Storage Color Code: Orange (General Storage)

Potential Health Effects

Inhalation:
No adverse health effects expected. Treat as a nuisance dust.
Ingestion:
Large doses may cause gastro-intestinal upset.
Skin Contact:
No adverse effects expected.
Eye Contact:
No adverse effects expected but dust may cause mechanical irritation.
Chronic Exposure:
No information found.
Aggravation of Pre-existing Conditions:
No information found.

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4. First Aid Measures

Inhalation:
Remove to fresh air. Get medical attention for any breathing difficulty.
Ingestion:
If large amounts were swallowed, give water to drink and get medical advice.
Skin Contact:
Wash exposed area with soap and water. Get medical advice if irritation develops.
Eye Contact:
In case of contact, immediately flush eyes with plenty of water for at least 15 minutes, lifting upper and lower eyelids occasionally. Call a physician if irritation persists.

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5. Fire Fighting Measures

Fire:
As with most organic solids, fire is possible at elevated temperatures or by contact with an ignition source. Contact with strong oxidizers may cause fire.
Explosion:
Fine dust dispersed in air in sufficient concentrations, and in the presence of an ignition source is a potential dust explosion hazard. For Cellulose: Minimum ignition temperature,

dust cloud: 410C. Minimum explosible concentration: 0.045 g/l.

Fire Extinguishing Media:

Water, dry chemical, foam or carbon dioxide. CAUTION: Pressure from the extinguishing media may cause severe dusting. Dispersed powder in air can create a severe explosion hazard.

Special Information:

In the event of a fire, wear full protective clothing and NIOSH-approved self-contained breathing apparatus with full facepiece operated in the pressure demand or other positive pressure mode.

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6. Accidental Release Measures

Remove all sources of ignition. Ventilate area of leak or spill. Wear appropriate personal protective equipment as specified in Section 8. Spills: Clean up spills in a manner that does not disperse dust into the air. Use non-sparking tools and equipment. Reduce airborne dust and prevent scattering by moistening with water. Pick up spill for recovery or disposal and place in a closed container.

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7. Handling and Storage

Avoid dust formation and control ignition sources. Employ grounding, venting and explosion relief provisions in accord with accepted engineering practices in any process capable of generating dust and/or static electricity. Empty only into inert or non-flammable atmosphere. Emptying contents into a non-inert atmosphere where flammable vapors may be present could cause a flash fire or explosion due to electrostatic discharge. Containers of this material may be hazardous when empty since they retain product residues (dust, solids); observe all warnings and precautions listed for the product.

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8. Exposure Controls/Personal Protection

Airborne Exposure Limits:

- OSHA Permissible Exposure Limit (PEL):

15 mg/m3 total dust, 5 mg/m3 respirable fraction for nuisance dusts.

- ACGIH Threshold Limit Value (TLV):

10 mg/m3 total dust containing no asbestos and < 1% crystalline silica for Particulates Not Otherwise Classified (PNOC).

Ventilation System:

A system of local and/or general exhaust is recommended to keep employee exposures as low as possible. Local exhaust ventilation is generally preferred because it can control the emissions of the contaminant at its source, preventing dispersion of it into the general work area. Please refer to the ACGIH document, *Industrial Ventilation, A Manual of Recommended Practices*, most recent edition, for details.

Personal Respirators (NIOSH Approved):

If the exposure limit is exceeded, a half-face dust/mist respirator may be worn for up to ten times the exposure limit or the maximum use concentration specified by the appropriate regulatory agency or respirator supplier, whichever is lowest. A full-face piece dust/mist respirator may be worn up to 50 times the exposure limit, or the maximum use concentration specified by the appropriate regulatory agency, or respirator supplier, whichever is lowest. For emergencies or instances where the exposure levels are not known, use a full-facepiece positive-pressure, air-supplied respirator. WARNING: Air-purifying respirators do not protect workers in oxygen-deficient atmospheres.

Skin Protection:

Wear protective gloves and clean body-covering clothing.

Eye Protection:

Use chemical safety goggles and/or full face shield where dusting or splashing of solutions is possible. Maintain eye wash fountain and quick-drench facilities in work area.

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9. Physical and Chemical Properties

Appearance:
White crystalline powder.
Odor:
Odorless.
Solubility:
Insoluble in water.
Bulk Density:
0.3 g/cc
pH:
No information found.
% Volatiles by volume @ 21C (70F):
No information found.
Boiling Point:
No information found.
Melting Point:
No information found.
Vapor Density (Air=1):
No information found.
Vapor Pressure (mm Hg):
No information found.
Evaporation Rate (BuAc=1):
No information found.

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10. Stability and Reactivity

Stability:
Stable under ordinary conditions of use and storage.
Hazardous Decomposition Products:
Carbon dioxide and carbon monoxide may form when heated to decomposition.
Hazardous Polymerization:

Will not occur.
Incompatibilities:
Strong oxidizing agents.
Conditions to Avoid:
Heat, flame, ignition sources, dusting, air, and incompatibles.

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11. Toxicological Information

Oral rat LD50: > 5,000 mg/kg; inhalation rat LC50: > 5,800 mg/m3/4-hour; skin rabbit LD50: > 2,000 mg/kg.

--------\Cancer Lists\----------

Ingredient	---NTP Carcinogen--- Known	Anticipated	IARC Category
Cellulose (9004-34-6)	No	No	None

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12. Ecological Information

Environmental Fate:
No information found.
Environmental Toxicity:
No information found.

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13. Disposal Considerations

Whatever cannot be saved for recovery or recycling should be managed in an appropriate and approved waste disposal facility. Processing, use or contamination of this product may change the waste management options. State and local disposal regulations may differ from federal disposal regulations. Dispose of container and unused contents in accordance with federal, state and local requirements.

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14. Transport Information

Not regulated.

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15. Regulatory Information

--------\Chemical Inventory Status - Part 1\----------

Ingredient	TSCA	EC	Japan	Australia
Cellulose (9004-34-6)	Yes	Yes	Yes	Yes

--------\Chemical Inventory Status - Part 2\----------

Ingredient	Korea	--Canada-- DSL	NDSL	Phil.
Cellulose (9004-34-6)	Yes	Yes	No	Yes

--------\Federal, State & International Regulations - Part 1\----------

Ingredient	-SARA 302- RQ	TPQ	------SARA 313------ List	Chemical Catg.
Cellulose (9004-34-6)	No	No	No	No

--------\Federal, State & International Regulations - Part 2\----------

Ingredient	CERCLA	-RCRA- 261.33	-TSCA- 8(d)
Cellulose (9004-34-6)	No	No	No

Chemical Weapons Convention: No TSCA 12(b): No CDTA: No
SARA 311/312: Acute: No Chronic: No Fire: No Pressure: No
Reactivity: No (Pure / Solid)

Australian Hazchem Code: No information found.
Poison Schedule: No information found.
WHMIS:
This MSDS has been prepared according to the hazard criteria of the Controlled Products Regulations (CPR) and the MSDS contains all of the information required by the CPR.

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16. Other Information

NFPA Ratings: Health: **0** Flammability: **1** Reactivity: **0**
Label Hazard Warning:
WARNING! POWDERED MATERIAL MAY FORM EXPLOSIVE DUST-AIR MIXTURES. COMBUSTIBLE SOLID.
Label Precautions:
Minimize dust generation and accumulation.
Keep away from heat, sparks and flame.
Keep container closed.
Use only with adequate ventilation.
Label First Aid:
Not applicable.
Product Use:
Laboratory Reagent.
Revision Information:

MSDS Section(s) changed since last revision of document include: 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 16.

Disclaimer:

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Prepared by: Strategic Services Division
Phone Number: (314) 539-1600 (U.S.A.)

SARGENTO. **QUALITY SYSTEMS**

Manual		Section		Sec./Subj. No.
Spices/Additives		Ingredient Specifications		5133394
Effective Date	Supersedes	Subject		Page No.
07-28-00	New	Vitacel L 600-30 FCC		1 of 2
Applies To		Issued By	Approved By	
Plymouth		Judy Doebert		

1.0 Description

1.1 It is used as an anticaking agent or thickener.

1.2 This product, as of the date of shipment or delivery shall conform with all applicable provisions of the Federal Food, Drug and Cosmetic Act, as amended, any similar state or local regulation, the provisions of the Federal Act as it pertains to articles being introduced into interstate commerce, and will not be adulterated or misbranded within the meaning of any state or local laws or ordinances and regulations promulgated thereunder having jurisdiction of said product.

1.3 This product must be manufactured in accordance with good manufacturing practices and comply with all applicable regulatory requirements.

2.0 Physical Characteristics

2.1 Appearance/Visual -- Fine, white powder

2.2 Flavor/Aroma -- odorless.

2.3 Particle Size -- screen residue maximum of 3% on 50µm. 15% maximum on 32 µm.

3.0 Chemical

3.1	Cellulose content	97 –102%
3.2	Arsenic	≤ 1 ppm
3.3	Chloride	≤ 0.05 %
3.4	Oxide ash (850°C, 4h)	≤ 0.3%
3.5	Heavy Metals	≤ 10 ppm
3.6	Loss on drying (105° C, 2 h)	≤ 7%
3.7	pH	5.0 - 7.5
3.8	Sulfur	≤ 0.01 %
3.9	Watersoluble substances	≤ 1.5 %
3.10	Bulk Density	approx 220 g/l

SARGENTO. **QUALITY SYSTEMS**

Manual	Section	Sec./Subj. No.
Spices/Additives	Ingredient Specifications	5133394
Effective Date / **Supersedes**	**Subject**	**Page No.**
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4.0 Ingredients

4.1 Natural cellulose fibres.

5.0 Packaging

5.1 Multilayer Polylined Paper bag

6.0 Storage

6.1 Cool, dry conditions

7.0 Shelf Life

7.1 5 years

Distribution:: A,C,D,

CONTROLLED COPY IN RED

J. RETTENMAIER & SÖHNE GMBH+CO

JRS

Fasern aus der Natur
Fibres designed by Nature

Holzmühle 1
D-73194 Rosenberg (Germany)
Phone: + 49 - (0) 79 67 / 152-0
Telefax: + 49 - (0) 79 67 / 152 222
e-mail: info@jrs.de
www.jrs.de

J. RETTENMAIER & SÖHNE · D-73194 Rosenberg · Holzmühle 1

CONFIRMATION

We herewith confirm that our **VITACEL / VIVAPUR** products

- i. e. WHEAT FIBRE, APPLE FIBRE, ORANGE FIBRE
  POWDERED CELLULOSE AND
  MICROCRYSTALLINE CELLULOSE

as well as our ARBOCEL celluloses

- do not contain any genetically modified materials,
- are not produced from genically modified raw materials.

Furthermore, no genetically modified processing aids are used during the production of the **VITACEL / VIVAPUR / ARBOCEL** products.

As it is not intended to change either raw material source or production process this status of our products will remain.

H. Bollinger

Managing Director
J. RETTENMAIER & SONS
Food Division
January 2000

3-31-2000 10:53PM FROM
MAR-27-2000 18:01 FROM INT'L FILLER CORP. TO 17704920809 P.01

Tembec
C.P. 3000, Temiscaming Quebec, Canada, J0Z-3R0
Tel: (819) 627-3300 Fax: (819) 627-8908

Fax

To:	Larry McKee	From:	Tom Brazeau
At:	International Filler	Pages:	1
Fax:	716-693-3528	Date:	27 March, 2000

Tembec hereby certifies that its pulp products supplied to International Filler Corporation contain less than 0.1 pg/g dioxin and furan (2,3,7,8 TCDD/TCDF) and less than 1mg/l of residual chlorine.

Best Regards,

Tom Brazeau
R&D Superintendent,
Specialty Cellulose

INTERNATIONAL FILLER CORPORATION
2496 SUMMER OAK DRIVE, ATLANTA, GA 30084
50 BRIDGE STREET, NORTH TONAWANDA, NY 14120

LESLEY MacFARLANE
DIRECTOR OF SALES

770-492-0360
770-492-0809 FAX
404-406-1313 MOBILE
www.internationalfiller.com
E-MAIL: lmacfarlane@internationalfiller.com

Tembec Inc, C.P. 3000, Témiscaming (Québec) Canada J0Z 2R0
Télétax : (819) 627-3303, Téléphone : (819) 627-3300

July 9, 1998

Mr. Brian Finn
International Filler
North Tonawanda, N.Y.

Dear Mr. Finn:

The intent of this note is to confirm that in our pulp delivered to International Filler, you will find no traces of furans and dioxins in parts per quadrillion (ppq).

Thank you for your business.

Best Regards.

Mark Giguère
Customer Service Manager

MG/ag

ISO 9002

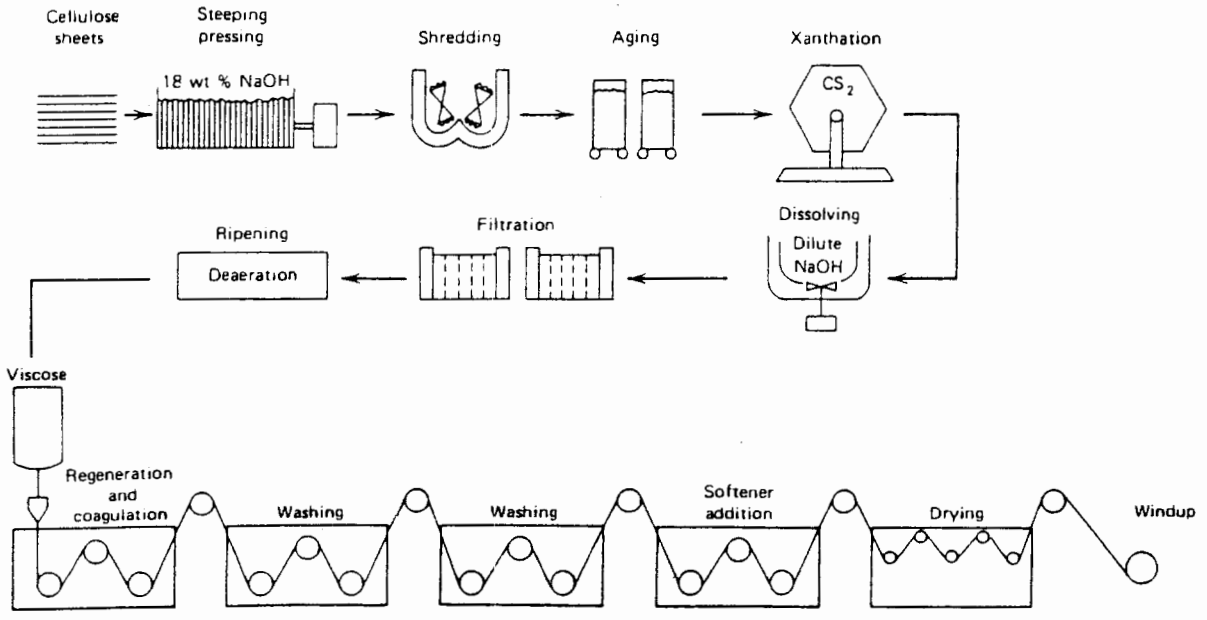
Viscose process for making regenerated cellulose food casings

The raw material for regenerated cellulose food casings is highly refined and purified wood pulp cellulose in sheet form. The wood pulp is made from southern hardwood and purchased by Viskase.

The process is started by steeping (soaking) wood pulp in sodium hydroxide solution to form alkali cellulose. After steeping the excess sodium hydroxide is removed by pressing. The alkali cellulose is shredded to form a fluffed alkali cellulose crumb. After aging the fluffed alkali cellulose crumb is reacted with carbon disulfide to form a cellulose xanthate crumb. This cellulose xanthate crumb is dissolved in aqueous sodium hydroxide to form viscose, filtered, ripened (aged), deaerated, and extruded.

In extrusion the viscose is pumped through a die into a regeneration and coagulation bath. This bath contains aqueous sulfuric acid and sodium sulfate which converts the cellulose xanthate in the viscose to regenerated cellulose. The resulting seamless tube of regenerated cellulose is washed free of salts and chemical byproducts, plasticized with glycerine, dried and wound to form reels of casing.

In finishing, reels of casing are shirred onto rods to form pleated or folded casing. The resulting stick of casing contains 50 feet or more of casing compressed and pleated to form a hollow-bored stick 12 to 25 inches long. The sticks are packaged and sold to food processors for manufacture of the skinless hot dog and other sausage products.



NOJAX® Casings Technical Data

NOJAX Casing is the Viskase Corporation trademark for small diameter cellulose casings. NOJAX Casings are produced in the form of shirred sticks designed for the production of hot dogs, small diameter cooked sausages, dry mini salamis and coarse ground fresh sausages. NOJAX Casing is suitable for high speed automatic stuffing machines, as well as for manual stuffing operations.

NOJAX Casings are manufactured to ensure optimal performance on today's most modern high speed production lines, and are known in the industry as the most reliable casings available.

Availability

NOJAX Casing sticks are available with either closed ends for use on automatic stuffing equipment or with open ends for manual stuffing.

Value-added Processing Aids include:

- E-Z PEEL® NOJAX Casing is available in all sizes to ensure perfect peelability.
- SENTINEL® NOJAX Casing, the world's first highly visible blue casing with a clear window for monitoring the color of the product, ensures thorough peeling of products.
- STRIPED NOJAX Casing, designed to aid in differentiating production, is available with four stripes. Striped casing also helps ensure peeling of product.
- NOJAX Casings are available in Dark Cherry and Light Orange to color product when desired.
- NOJAX Casings are available in one color printing. Artwork is continuously printed on the casing.

CASING SIZE	Recommended Stuffing	
	IN.	mm
16	.59-.64	15.7-16.2
17	.64-.66	16.3-16.8
18	.67-.69	17.0-17.5
19	.70-.72	17.8-18.3
20	.73-.75	18.5-19.0
21	.76-.78	19.3-19.8
22	.79-.80	20.0-20.5
23	.80-.83	20.5-21.0
24	.85-.87	21.5-22.0
25	.89-.91	22.5-23.0
26	.93-.95	23.5-24.0

CASING SIZE	Recommended Stuffing	
	IN.	mm
27	.97-.99	24.5-25.0
28	1-1.02	25.5-26.0
29	1.04-1.06	26.5-27.0
30	1.08-1.10	27.5-28.0
31	1.12-1.14	28.5-29.0
32	1.16-1.18	29.5-30.0
33	1.20-1.22	30.5-31.0
34	1.24-1.26	31.5-32.0
36	1.32-1.34	33.5-34.0
40	1.50-1.54	38.0-39.0
44	1.58-1.62	40.0-41.0

Supporting Services

Viskase Corporation offers customers distribution and inventory reduction savings on NOJAX Casings through its Palletization, Customer Pick-Up and 119-Day Order Programs. Contact a Viskase Corporation Technical Sales Representative in your area for information about these programs, or for additional technical information.

Storage - Handling

NOJAX Casings are ready to use and are delivered in special packages to retain the optimal moisture. Store in a cool, dry place away from steam pipes or hot storage areas. Best storage temperatures are 40°-75°F (4°-24°C). Ensure that any unused casings are placed in tightly closed bags to restrict moisture loss.

Viskase Corporation
6855 West 65th Street
Chicago, Illinois 60638 U.S.A.
Tel: 708/496-4200
Fax: 708/496-4412

Viskase Corporation
Asia Pacific/Latin America
6855 West 65th Street
Chicago, Illinois 60638 USA
Tel: 708/496-4200
Fax: 708/496-4721
Telex: 6714599

מוסד הכשרות דאמריקא

NATIONAL KASHRUTH®

101 Rt. 306 Monsey, N.Y. 10952
(914) 352-4448
Fax (914) 356-9756

Rabbi Yacov Lipschutz
President

Rabbi Mendel Simon
Administrator Field Operations

Barry R. Eizik
Director

6,

October 20, 1998

LETTER OF CERTIFICATION

VISKASE CORPORATION

CHICAGO, ILLINOIS 60638

THIS IS TO CERTIFY THAT THE CELLULOSE FOOD CASINGS
produced by the
VISKASE CORPORATION
in Chicago, Illinois *(BAR CODE # 60638)*
and in Osceola, Arkansas *(BAR CODE #72370),* are manufactured under the supervision of *NATIONAL KASHRUTH*
and are accordingly KASHRUTH ENDORSED- K O S H E R / P A R E V E.
Included in this certification are all varieties of :
NOJAX®CASING and FIBROUS CASING.

For PASSOVER - Passover approved casings must bear a colored label on the cartons indicating *NK* Kosher/Pareve Passover.

This certification is valid through *NOVEMBER 25, 1999,* and is to be renewed at that time.

Sincerely yours,
NATIONAL KASHRUTH

Rabbi Yacov Lipschutz
President

RYL:tw

Jim Pierce

From: Jim Pierce
Sent: Friday, February 23, 2001 2:19 PM
To: Jim Pierce
Subject: Kelly Shea on Petitioning cellulose

-----Original Message-----
From: Kelly Shea [mailto:KellyS@HORIZONORGANIC.com]
Sent: Friday, February 23, 2001 11:50 AM
To: 'Jim Pierce'
Subject: FW: 5 Commercial Availability opinions

Dear Jim,

Thanks for your e-mail, I would like to outline for you my research, analysis, and interpretation which leads me to believe cellulose for shreds
does not need to be petitioned. Federal Register/Vol. 65, No. 246 (NOP Final Rule) page 80587, Preamble:

"To be added as an ingredient or used in the processing of a product labeled
"organic," a minor ingredient must be from an organic agricultural source,
if commercially available. If not commercially available, the ingredient must be an agricultural product or a substance consistent with the National
List."

Federal Register/Vol. 65, No. 246 (NOP Final Rule) page 80638 205.2 Terms
Defined

"Agricultural product. Any agricultural commodity or product, whether raw or
processed, including any commodity or product derived from livestock, that
is marketed in the United States for human or livestock consumption."

Federal Register/Vol. 65, No. 246 (NOP Final Rule) page 80616, Preamble:

"(7) Nonsynthetic Agricultural Processing Aids on the National List. A commenter requested clarification from the NOP on whether processing aids
(e.g., defoaming agents), which are nonsynthetic and nonorganic agricultural
substances (e.g., soybean oil), must appear on the National List when used
in processing. In the this regulation, a nonsynthetic and nonorganic agricultural product, such as soybean oil, used as a processing aid does not

have to appear on the National List. Such products are included in the provision in section 205.606 that nonorganically produced agricultural products may be used in accordance with any applicable restrictions when the substance is not commercially available in organic form."

Cellulose, as casings, is a processing aid that is non-synthetic and is a non-organic agricultural substance. I deduce, based on the above, that it does not need to be petitioned. Cellulose, as a minor ingredient (in shredded cheese to prevent caking) is a product which is not commercially available as organic, is agricultural, and is not on the National List in section 205.606 as a "nonorganically produced agricultural products... with any applicable restrictions." I have diligently researched the cellulose used for shreds (including the manufacturing process for the cellulose, though this is not required) and feel very comfortable with my conclusions.

Therefore, I feel you may record this justification in your company files, focus on other items that definitely need petitioning, and save yourself, NOSB, and NOP a lot of time and money. Now keep in mind, I am neither a professional consultant nor an expert. What I am is a concerned colleague attempting to define and take the high road in a world, in a land where no one has the answer. We need to keep in mind, that rules and regulations are purposefully vague. Not for the purpose of leaving "loopholes" for mischief and harm. The purpose is to leave room for interpretation and prevent us from painting ourselves into a corner.

File : Cellulose NL Petition

Crofters Food Ltd.
7 Great North Road, Parry Sound, Ontario P2A 2X8
Producer of Natural Jams and Juices

FAX MESSAGE

To:	**NOP**	**Attn:**	**RICK MATHEWS**
Re:	**Cellulose Review for Nat. List**	**Date:**	**September 25, 2001**
Pages:	**1 + 6**	**Fax#:**	**202-690-3924**

Dear Rick

I was directed to you from Scott at OMRI. We produce certified organic fruit juices and beverages, and use a cellulose product to stabilize the fruit mash for pressing on a pack press. I have attached product information for your reference. In addition, we have done organochlorine compound analysis of the cellulose and of juice pressed with this material, and have not found any detectable residues. We also have not found an efficient alternative to the cellulose material which works for our process.

I hope this information is of use in assessing cellulose materials for inclusion in the National List. Please do not hesitate to call if we can supply any further information.

Sincerely

John E. Warner M.Sc.
Quality control & Regulatory Affairs

FS&D
Fiber Sales & Development Corp.

A subsidiary of Protein Technologies International

Solka-Floc Powdered Cellulose Specification

Grade	10 (Industrial)
Organoleptic	White to cream colored, fibrous powder containing no obvious foreign material.
Screen Analysis (Ro-Tap, Tyler screens)	
% on 35 mesh	Less Than 10
% through 100 mesh	Not Less Than 45
% through 200 mesh	Not Less Than 20
Bulk Volume, (cc/g)	5.5 ± 0.5
Ash (800°C), %	Less Than 0.5
Iron, %	Less Than 0.005
Sulfur, %	Less Than 0.01

Note: Grade 10 used to be known as SW-40

July 5, 1995.

Makers of SOLKA FLOC

Checkerboard Square • St. Louis, MO 63164
Phone: 800-225-7108 • Fax: 314-982-5057
Customer Service: 800-258-0351

GENERAL FILTRATION

Division of Lee Chemicals Limited
441-A APPLEWOOD CRESCENT
CONCORD, ONTARIO L4K 4J3

"EXPERTISE IN LIQUID FILTRATION"

TEL: (905) 761-9000 FAX: (905) 761-9001

FAX TRANSMISSION **Three Page(s) Including This One**

Date: August 6, 1997

To: Crofters Foods Limited
Parry Sound, Ontario
Ph: (705) 746-6301
Fax: (705) 746-2733

Attention: Mr. Gerhardt Latke

Subject: Solka-floc Specifications

Dear Mr. Latke:

On pages two and three of this message, I am transmitting:

- a sheet giving a general description of Solka-floc grades;
- a data sheet specific to grade 10.

The manufacturers of Solka-floc guarantee that the product meets the specifications of the monograph on Powdered Cellulose in the Food Chemicals Codex, 3rd Edition.

We appreciate our business with Crofters. Please do not hesitate to call whenever we may be of service.

Yours truly,

GENERAL FILTRATION
Division of Lee Chemicals Limited

Edward M. Bridge

FS&D
Fiber Sales & Development Corp.

A subsidiary of Protein Technologies International

Solka-Floc® is the trade name for a family of finely-divided fibrous products manufactured from purified cellulose. Its purity and controlled properties make it the ideal material for a wide range of applications.

Filtration

Solka-Floc is an effective pre-coat aid or body-feed agent in both liquid and air filtration. The fine cellulose fibers form a unique filter cake promoting good flow rate resulting in high clarity filtered products.

Rubber and Plastics

Solka-Floc is an excellent filler for a wide variety of rubber and plastic products. Solka-Floc improves dimensional stability, reduces green shrinkage, improves impact strength and improves drying rate of stable foams.

Rubber and plastics applications for Solka-Floc include a wide variety of thermoset resins for injection molding and rubber compounds for floor tiles, shoe soles, etc.

Ceramics

Solka-Floc is ashless and is used in the manufacturing of ceramic products as a burn out agent and to provide controlled porosity.

Welding

Solka-Floc can be used for the manufacture of coated welding electrodes. It is used as a plasticizer, bulking agent, arc intensifier, absorbent and lubricant.

General Industrial

Solka-Floc can be used as a binder, texturizer and thickening agent in products such as latex paints, texture and adhesive compounds. It also is used as the raw material in reacted cellulose products such as carboxymethyl cellulose and hydroxyethyl cellulose.

SOLKA-FLOC®
Properties and Grades
Industrial Applications

Grade	Average Fiber Length (Microns)	Bulk (cc per gram)	Color	ASH (800 C)	Water Retention	Screen Analysis (RO-TAP, TYLER) % On 35 Mesh	% thru 100 Mesh	% thru 200 Mesh
1016	290	5.5-6.5	White	.17%	1000	0-12	45-75	30-40
10	120	5.2-6.2	White	.15%	950	0-8	60-80	30-55
20	100	3.0-4.0	White	.13%	650	0-5	80-90	55-75
40	60	2.8-3.3	White	.14%	550	0-3	80-95	60-85
60	50	2.5-2.8	White	.17%	500	0-1	85-98	65-90
100	40	2.2-2.6	White	.21%	400	0	90-100	70-95
200	35	2.1-2.6	White	.20%	400	0	93-100	75-100
300	22	2.1-2.4	White	.22%	420	0	100*	95*

* Alpine Air Jet Sieve Analysis

Makers of SOLKA FLOC

TYPICAL TEST DATA - NOT TO BE CONSTRUED AS SPECIFICATIONS

Headquarters
Checkerboard Square • St. Louis, MO 63164
Phone: 800-325-7103

Sales Office
166 Lennox • Green Brook, NJ 08812
Phone: 908-968-5024 • Fax: 908-968-5117
Customer Service: 800-258-0351

FS&D

Fiber Sales & Development Corp.

A subsidiary of Procin Technologies International

MATERIAL SAFETY DATA SHEET

May be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200.

IDENTITY (As Used on Label):	DESCRIPTION:
KEYCEL® POWDERED CELLULOSE	POWDERED CELLULOSE
SOLKA FLOC® POWDERED CELLULOSE	CAS #: 9004-34-6

SECTION I

Manufacturer's Name	Emergency Telephone Number
FIBER SALES AND DEVELOPMENT CORPORATION	513-652-2101
	Telephone Number for Information
Address	Telephone Number for Information
1228 Muzzy Road Urbana, OH 43078	314-982-1178 or 314-982-2185
Date Prepared	January 1, 1997

SECTION II -- HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

Hazardous Components (Specific Chemical Identity; Common Name(s))	OSHA PEL	ACGIH TLV	Other Limits Recommended	% (Optional)
Total Dust	15 mg/m³	10 mg/m³	---	N/A
Respirable	5 mg/m³	---	---	

SECTION III -- PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point	N/A	Density (g/cc)	1.27-1.61
Vapor Pressure (mm Hg.)	N/A	Melting Point	N/A
Vapor Density (AIR = 1)	N/A	Evaporation Rate (Butyl Acetate = 1)	N/A

Solubility in Water Insoluble in water.

Appearance and Odor Color: White Odor: None

Makers of

SOLKA-FLOC®

Headquarters
Checkerboard Square • St. Louis, MO 63164
Phone: 800-325-7108

Sales Office
P.O. Box 885 • Green Brook, NJ 08812-0885
Phone: 908-968-5024 • Fax: 908-968-5117
Customer Service: 800-258-0351

SECTION IV -- FIRE AND EXPLOSION HAZARD DATA

Flash Point (Method Used)	Flammable Limits	LEL	UEL
N/A	N/A	N/A	N/A

Minimum Ignition Energy Cloud (joules): - 0.20
Minimum Conc. for Explosion (oz./cu.ft.): - 0.080
Minimum Ignition Temperature Layer (degrees C.): - 240

Extinguishing Media
Water. Carbon-dioxide, dry chemical or foam

Special Fire Fighting Procedures
In the event of a fire, wear full protective clothing and NIOSH Approved Self-Contained Breathing Apparatus.

Unusual Fire and Explosion Hazards
None

SECTION V -- REACTIVITY DATA

Stability	Stable	Unstable
	x	

Conditions to Avoid: None

Incompatibility (Materials to Avoid): None

Hazardous Decomposition or Byproducts
None Known

Hazardous Polymerization	May Occur	Conditions to Avoid	None
	Will Not Occur		
	X		

SECTION VI -- HEALTH HAZARD INFORMATION

Route(s) of Entry: Inhalation? Yes Skin? Yes Ingestion? Yes

Health Hazards (Acute and Chronic)
Exposure to high concentrations of dust may result in upper respiratory tract (nose and throat) irritation. An allergic reaction may occur in some persons due to inhalation of or contact with these products. PEL (OSHA Permissible Exposure Limit): For nuisance dust.
15 mg/m³ for total dust and 5 mg/m³ for respirable dust.

Carcinogenicity:	NTP?	IARC Monographs?	OSHA Regulated?
None	None	None	No

Signs and Symptoms of Exposure
Refer to health hazards listed above.

Medical Conditions

Generally Aggravated by Exposure
None known under proper usage conditions.

Emergency and First Aid Procedures
Eyes/Skin: Flush with water. Inhalation: If breathing difficulty occurs, remove to fresh air and call physician.

SECTION VII -- PRECAUTIONS FOR SAFE HANDLING AND USE

Steps to Be Taken in Case Material Is Released or Spilled
May be cleaned up with broom and shovel.

Waste Disposal Method
Dispose of in accordance with local, state and federal regulations.

Precautions to Be Taken in Handling and Storing
Product should be stored on pallets without contact to walls, ceiling or floor. Storage areas should be well ventilated and free of strong and objectionable odors.

Other Precautions
Avoid open flames and spark sources.

SECTION VIII -- CONTROL MEASURES

Respiratory Protection (Specify Type) If dust levels exceed 15 mg/m^3, a NIOSH approved dust mask is recommended.

Ventilation
Adequate to handle dust indigenous to operations.

Local Exhaust
If dusting occurs

Special
N/A

Mechanical (General)
Not normally required

Other
N/A

Protective Gloves
Not normally required

Eye Protection
Recommended. Wearing contact lenses is not recommended in a dusty environment.

Other Protective Clothing or Equipment
None normally required

Work/Hygienic Practices
Use good personal hygiene practices as necessary for food products.

USDA NATIONAL ORGANIC PROGRAM
WASHINGTON, DC 20050
FAX NUMBER 690-3924/205-7808

FACSIMILE TRANSMITTAL SHEET

TO: Kim Burton	FROM: Bob Pooler
COMPANY: JM Smucker	DATE: 09/26/01
FAX NUMBER: 530-891-6397	TOTAL NO. OF PAGES INCLUDING COVER: 8
PHONE NUMBER:	SENDER'S NUMBER: 202-690-3655

RE: Cellulose petition for NL, addendum

☒ URGENT ☒ FOR REVIEW ☐ PLEASE COMMENT ☒ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Kim,

Can this information be included with the NL petition for cellulose?

Can cellulose be evaluated to be included in all organic products (processing) & vs the use specified in the petition?

This information is also being forwarded to OMRI.

Bob

* * * Transmission Result Report(MemoryTX) (Sep.26. 2001 12:00PM) * * *
USDA/AMS/TM/NOP 2022057808

File No.	Mode	Destination	Pg(s)	Result	Page Not Sent
2539	Memory TX	9-15308916397	P. 8	OK	

Reason for error
E.1) Hang up or line fail
E.2) Busy
E.3) No answer
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USDA NATIONAL ORGANIC PROGRAM
WASHINGTON, DC 20050
FAX NUMBER 690-3924/205-7808

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RE: Cellulose petition for NL, addendum

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NOTES/COMMENTS:

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Can this information be included with the NL petition for cellulose?
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Bob

* * * Transmission Result Report (MemoryTX) (Sep.26. 2001 12:08PM) * * *
USDA/AMS/TM/NOP 2022057808

File No.	Mode	Destination	Pg(s)	Result	Page Not Sent
2540	Memory TX	9-15413438971	P. 7	OK	

Reason for error
E.1) Hang up or line fail
E.2) Busy
E.3) No answer
E.4) No facsimile connect on

09/25/2001 13:43 705-746-2733 CROFTER'S FOOD LTD. PAGE 01

CROFTER'S ORGANIC

Crofters Food Ltd.
7 Great North Road, Parry Sound, Ontario P2A 2X8
Producer of Natural Jams and Juices.

FAX MESSAGE

To:	**NOP**	**Attn:**	**RICK MATHEWS**
Re:	**Cellulose Review for Nat. List**	**Date:**	**September 25, 2001**
Pages:	**1 → 6**	**Fax#:**	**202-690-3924**

Dear Rick

I was directed to you from Scott at OMRI. We produce certified organic fruit juices and beverages, and use a cellulose product to stabilize the fruit mash for pressing on a pack press. I have attached product information for your reference. In addition, we have done organochlorine compound analysis of the cellulose and of juice pressed with this material, and have not found any detectable residues. We also have not found an efficient alternative to the cellulose material which works for our process.

I hope this information is of use in assessing cellulose materials for inclusion in the National List. Please do not hesitate to call if we can supply any further information.

Post-it® Fax Note 7671		Date 09/26/01	# of pages ▸ 7
To K. Dawkins		From Bob Bolen	
Co./Dept. OMRI		Co. USDA/NOP	
Phone #		Phone # 202-690-3455	
Fax # 541-343-8971		Fax #	

Sincerely

John E. Warner M.Sc.
Quality control & Regulatory Affairs

This information may be added to the NL petition for cellulose, cellulose may be considered for all uses.

Phone: (705) 746-6301 Fax: (705) 746-2733 Email: crofters@vianet.on.ca

File: Cellulose

Pooler, Bob

From: KBurton@jmsmucker.com%inter2 [KBurton@jmsmucker.com]
Sent: Friday, September 28, 2001 12:03 PM
To: Pooler, Bob; Strother, Toni
Subject: Cellulose letter of support

cellulose letter of support.do...

----- Forwarded by Kim Burton/Chico/JMS on 09/28/2001 09:03 AM -----

Kathy Ellertson	To:	nlpetition@usda.gov
	cc:	Kim Burton/Chico/JMS@JMS
07/11/2001 02:51 PM	Subject:	Cellulose letter of support

Dear NOP and NOSB:

Please find attached a letter from The J. M. Smucker Company in support of petitions for the allowance of cellulose in organic food processing.

Thank you.

Kathy Ellertson
The J. M. Smucker Company

(See attached file: cellulose letter of support.doc)

Pooler, Bob

From: KBurton@jmsmucker.com%inter2 [KBurton@jmsmucker.com]
Sent: Friday, September 28, 2001 12:02 PM
To: Pooler, Bob; Strother, Toni
Subject: cellulose

please include the document from Crofters as a letter of support for the petition of cellulose. I'm also going for forward to you the additional letters of support from Horizon and Smuckers in case you don't have them. These too should be in the TAP packet to the board.

Petitions should be submitted in duplicate to:
National Organic Standards Board,
c/o Robert Pooler, Agricultural Marketing Specialist,
USDA/AMS/TM/NOP, Room 2510-So., Ag Stop 0268,
P.O. Box 96456,
Washington, D.C. 20090-6456.
Phone: 202/720-3252.
Fax: 202/205-7808.
e-mail: nlpetition@usda.gov.

From: