

**Formal Recommendation by the  
National Organic Standards Board (NOSB)  
to the National Organic Program (NOP)**

**Date:** April 29, 2011

**Subject:** Potassium Iodide 605(b) Sunset

**Chair:** Tracy Miedema

**The NOSB hereby recommends to the NOP the following:**

Rulemaking Action     X  
Guidance Statement     .  
Other

**Statement of the Recommendation (Including Recount of Vote):**

The committee believes that the currently listing of Potassium Iodide on 205.605(b) is unnecessary given its inclusion under Nutrient Vitamins and Minerals. Accordingly, we recommend that this substance be removed from 205.605(b).

The handling committee recommends the removal of this substance from section 205.605(b) of the National List:

Potassium iodide—for use only in agricultural products labeled “made with organic (specified ingredients or food group(s)),” prohibited in agricultural products labeled “organic.”

The motion made was to relist Potassium Iodide to 605(b). The motion failed unanimously.

**Rationale Supporting Recommendation (including consistency with OFPA and NOP):**

An update Technical Review prepared in 2011 supports the existence of both natural and synthetic forms of Potassium Iodide. Given that the 605(b) listing is redundant (since KI is also allowed under the listing for Nutrient Vitamins and Minerals), the committee supports the removal of KI from 605(b). No public comment supporting the continued listing of KI to 605(b) was received by the board.

**NOSB Vote:**

<b>Moved:</b> Steve DeMuri		<b>Second:</b> Mac Stone		
<b>Yes:</b> 0	<b>No:</b> 14	<b>Abstain:</b> 0	<b>Absent:</b> 0	<b>Recusal:</b> 0

**National Organic Standards Board  
Handling Committee  
Sunset 2012 Proposed Recommendation  
Potassium Iodide on § 205.605(b)**

**April 29, 2011**

**List: 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”**

**(b) Synthetics allowed**

**Potassium iodide—for use only in agricultural products labeled “made with organic (specified ingredients or food group(s)),” prohibited in agricultural products labeled “organic.”**

**Committee Summary**

According to FDA, potassium iodide may be used as food additive and can serve the following functions:

- A nutrient in table salt as a source of iodine.
- A dietary supplement for human consumption and in animal feeds.
- A sanitizing agent for food processing equipment.

Potassium iodide is listed on the National List of Allowed and Prohibited Substance in both §205.605 (a) Nonsynthetics allowed and (b) Synthetics allowed, with an annotation restricting its use to Made With Organic Products. Additionally, its use is also allowed under the 205.605(b) listing for Nutrient Vitamins and Minerals. In addition, KI may be allowed under §205.603 (d) (2), as feed additives (trace minerals, used for enrichment or fortification when FDA approved). This sunset recommendation only relates to the 605(b) listing of this substance.

KI can be both extracted from seaweeds or brines (nonsynthetic) and created through a number of chemical processes (synthetic). The 1995 technical review for this substance notes that KI extracted from brines is not commonly commercially available, but may be used in some applications. This assessment is confirmed by the 2011 technical report on KI. Accordingly, the substance is listed on both 605(a) and (b), with use of the synthetic version (on 605(b)) restricted to “Made with organic” products.

The committee believes that the currently listing of Potassium Iodide on 205.605(b) is unnecessary given its inclusion under Nutrient Vitamins and Minerals. Accordingly, we recommend that this substance be removed from 205.605(b).

**Committee Recommendation(s)**

The handling committee recommends the removal of this substance from section 205.605(b) of the National List:

Potassium iodide—for use only in agricultural products labeled “made with organic (specified ingredients or food group(s)),” prohibited in agricultural products labeled “organic.”

**Committee Vote**

Motion: To relist potassium iodide on § 205.605(b)

Motion by: Joe Dickson    Second: Katrina Heinze

Yes: 0      No: 6      Absent: 1      Abstain: 0      Recuse: 0