

**FORMAL RECOMMENDATION BY THE
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
TO THE NATIONAL ORGANIC PROGRAM (NOP)**

Date: 11/05/09

Subject: Tetrasodium Pyrophosphate (CAS # 7722-88-5) Sunset Review

Chair: Jeff Moyer

Recommendation

The NOSB hereby recommends to the NOP the following:

Rulemaking Action: X
Guidance Statement:
Other:

Summary Statement of the Recommendation (including Recount of Vote):

Tetrasodium Pyrophosphate (TSPP), with its annotation, was reviewed for sunset by the NOSB at the November 2009 meeting. A summary of the Handling committee's recommendation is attached. No comments were received during the meeting that disagreed with the committee's recommendation.

The NOSB voted to recommend relisting of Tetrasodium Pyrophosphate (CAS #7722-88-5) for use only in meat analog products on §205.605(b) with 13 voting yes, 0 no votes and 2 absent.

NOSB Vote: **Motion:** Steve DeMuri **Second:** Dan Giacomini

Board vote: Yes - 13 No- 0 Abstain- 0 Absent - 2

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

Response by the NOP:

National Organic Standards Board
Handling Committee Recommendation for §205.605(b)
Sunset of Tetrasodium Pyrophosphate

September 9, 2009

I. List:

National Organic Program Subpart G: The National List of Allowed and Prohibited Substances. §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

II. Committee Summary:

Tetrasodium pyrophosphate (TSPP) was added to the National List §205.605(b) effective on September 12, 2006 by Final Rule TM-04-01FR based on the NOSB recommendation of April 2004. It carries the annotation “for use only in meat analog products”.

Tetrasodium pyrophosphate (CAS # 7722-88-5) was originally petitioned for use as a pH buffer and dough conditioner for use in organic meat alternative products. It is a relatively common GRAS food additive with USDA and FDA approval for many functions in conventional foods, as an emulsifier, buffer, nutrient, dietary supplement, sequestrant, and texturizer. According to the TAP review, dated July 29, 2002, TSPP is prepared by molecular dehydration of dibasic sodium phosphate at 500 degrees C. Relatively minor negative environmental impact from manufacture and use is usually associated with it’s application in the detergent industry, not from it’s food uses. TSPP has been linked to kidney damage in rat studies, but most of the literature cited in the TAP referred to health effects related to it’s medical, not food, uses, and reviewers did not convey concern over it’s health effects on humans.

All reviewers agreed that the substance is a synthetic. One recommended it be listed on the National List for the petitioned use, with limits as per Good Manufacturing Practices, but two reviewers were of the opinion it should not be listed. It passed a full NOSB vote for listing in April 2004, 10 yes, 3 no, and 1 absent.

The NOSB has received three public comments in support of, and no public comments opposed to, the relisting of Tetrasodium pyrophosphate in response to the Federal register notice of the sunset of Tetrasodium pyrophosphate (AMS-TM-07-0136). No new information has been brought forward or discovered that causes the Handling Committee to recommend against the relisting of this substance.

III. Committee Recommendations

The Handling Committee recommends the continued listing of Tetrasodium pyrophosphate (CAS # 7722-88-5) – for use only in meat analog products in the National List section 206.605(b).

Moved: Steve DeMuri

Second: Joe Smillie

Committee Vote: Yes- 5 No- 0 Absent- 1 Abstain- 0 Recuse- 0