

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

Date: 6-06-06

Subject: Sunset Renewal Vote for Lecithin – unbleached, under 205.606

Chair: Kevin O'Rell

Recommendation

The NOSB hereby recommends to the NOP the following:

Rulemaking Action: XXXXX

Guidance Statement:

Other:

Statement of the Recommendation (including Recount of Vote):

Recommendation to Renew Lecithin – unbleached under 205.606.

Moved: Julie Weisman Second: Nancy Ostiguy

Yes – 12

No – 0

Abstain – 0

Absent – 2

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

Sunset Material Vote

Response by the NOP:

**National Organic Standards Board
Handling Committee
Final Recommendation for 205.606 – Lecithin, unbleached**

April 20, 2006

I. List: 205.606 Non-organically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”

II. Committee Summary: Many comments were received supporting the retention of materials, including lecithin – unbleached, currently listed in section 205.606. One commenter, who generally appeared to object to the entire National List, opposed the re-listing of this material. However detailed information as to why lecithin-unbleached was not compatible with organic practices, as specified in the Federal Register, was not provided in this comment. Another commenter noted that organic forms of lecithin are available, and had concerns that there will be no market for the organically produced material if the non-organically produced material remains on the list. However, some commenters also noted that the organic form is either insufficient in quantity or inadequate in functionality. Comments were received from a manufacturer of organic lecithin – unbleached who indicated that organic lecithin, unbleached can be manufactured in sufficient quantity to meet demand. However, this manufacturer also clearly stated that organic forms of every formulation of lecithin – unbleached that are currently being used do not exist.

The handling committee agrees, based on compelling evidence given by a manufacturer of organic lecithin – unbleached, that every use of lecithin – unbleached cannot be adequately filled by the organic forms that are currently available.

III. NOSB Recommendation(s): The handling committee **recommends the renewal** of the following substances in this use category:

Lecithin-unbleached

The handling committee recommends deferring the vote on the following materials until further technical information is obtained. The materials to be deferred are:

None in this category

The handling committee recommends not renewing the following substances in this use category based on the submitted evaluation forms:

None in this category

NOSB Vote:

Moved: Julie Weisman

Second: Nancy Ostiguy

Board vote: Yes – 12

No – 0

Abstain – 0

Absent - 2