United States Department of Agriculture
Agricultural Marketing Service | National Organic Program
Document Cover Sheet
https://www.ams.usda.gov/rules-regulations/organic/national-list/petitioned

Document Type:

☒ **National List Petition or Petition Update**

A petition is a request to amend the USDA National Organic Program's National List of Allowed and Prohibited Substances (National List).

Any person may submit a petition to have a substance evaluated by the National Organic Standards Board (7 CFR 205.607(a)).

Guidelines for submitting a petition are available in the NOP Handbook as NOP 3011, National List Petition Guidelines.

Petitions are posted for the public on the NOP website for Petitioned Substances.

☐ **Technical Report**

A technical report is developed in response to a petition to amend the National List. Reports are also developed to assist in the review of substances that are already on the National List.

Technical reports are completed by third-party contractors and are available to the public on the NOP website for Petitioned Substances.

Contractor names and dates completed are available in the report.

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April 3, 2020

Devin Patillo
Agricultural Marketing Specialist
1400 Independence Avenue, SW.
Room 2642-South, STOP 0268
Washington, DC 20250-0268

Dear Mr. Patillo,

Thank you for your April 2, 2020 response to Kemin Food Technologies' petition requesting an amendment of the allowance for phosphoric acid at section 205.605(b) of the National Organic Program's (NOP) National List of Allowed and Prohibited Substances (National List). Please see the information below in response to the NOB Handling Subcommittee's questions:

- From the petition recommendation we intend to use the suggested annotation to extract target molecules, including but not limited to antioxidants, from various plant species of the *lamiaceae* family. In order to prepare the proper extraction solvent, tap water pH will be adjusted to lower pH. This adjustment is critical to successful extraction because such low pH inhibits enzymatic oxidation that would otherwise destroy the target molecules.[1] Regarding use of the extract, as consumer preferences begin to change and shift away from chemically sounding ingredients, consumers are looking to purchase and consume foods made with ingredients that come from natural sources. For food manufacturers, this means finding replacements for traditionally used synthetic ingredients, such as plant-based molecules.
- The petition is intended to be limited to extracting target molecules from plants of the *lamiaceae* family. The extracted target molecules may be subsequently blended with appropriate carriers for help in proper dispersal across the surface of finished food products. Application depends on the finished food matrix as different extracts have hydrophilic or lipophilic properties.

If you have further questions, please contact me by email at will.schroeder@kemin.com.

Respectfully submitted,

William D. Schroeder, Ph.D.
Vice President, Food Safety and Quality
Kemin Food Technologies

[1] *See e.g.* Eddine *et al., Solvent pH extraction effect on phytochemical composition and antioxidant properties of Alergian Matricaria Pubescens*, J Pharm Res, Vol. 10 Issue 2, Feb. 2016