

NOSB COMMITTEE RECOMMENDATION

Form NOPLIST1. Committee Transmittal to NOSB

For NOSB Meeting: <u>March 2007</u>	Substance: <u>Rice Starch, non-modified</u>
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Committee: Crops Livestock Handling Petition is for: Inclusion of Rice Starch, non-modified
on the National List § 205. 606

A. Evaluation Criteria (Applicability noted for each category; Documentation attached)	Criteria Satisfied? (see B below)
1. Impact on Humans and Environment	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2. Essential & Availability Criteria	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3. Compatibility & Consistency	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4. Commercial Supply is Fragile or Potentially Unavailable as Organic (only for 606)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

B. Substance Fails Criteria Category: _____ Comments: _____

C. Proposed Annotation (if any): until two years from date of publication

Basis for annotation: To meet criteria above: _____ Other regulatory criteria: Citation: Shortened listing is due to abbreviated comment period.

D. Recommended Committee Action & Vote (State Actual Motion): Recommend for listing on §205.606 until two years from date of publication.

Motion by: Andrea Caroe Seconded: Steve DeMuri Yes: 5 No: 0 Absent: 0 Abstain: 0

Crops		Agricultural	<input checked="" type="checkbox"/>	Allowed ¹	<input checked="" type="checkbox"/>
Livestock		Non-Synthetic		Prohibited ²	
Handling	<input checked="" type="checkbox"/>	Synthetic		Rejected ³	
No restriction		Commercially Un-Available as Organic ¹	<input checked="" type="checkbox"/>	Deferred ⁴	

1) Substance voted to be added as "allowed" on National List to § 205. 606 with Annotation (if any) until two years from date of publication.

2) Substance to be added as "prohibited" on National List to § 205. _____ with Annotation (if any) _____

Describe why a prohibited substance: _____

3) Substance was rejected by vote for amending National List to § 205. _____ Describe why material was rejected: _____

4) Substance was recommended to be deferred because _____
 _____ If follow-up needed, who will follow up _____

E. Approved by Committee Chair to transmit to NOSB:

<u>Julie Weisman</u> Committee Chair	<u>March 12, 2007</u> Date
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NOSB EVALUATION CRITERIA FOR SUBSTANCES ADDED TO THE NATIONAL LIST

Category 1. Adverse impacts on humans or the environment? Substance - Rice Starch, non-modified

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
1. Are there adverse effects on environment from manufacture, use, or disposal? [§205.600 b.2]			X	This is an agricultural product.
2. Is there environmental contamination during manufacture, use, misuse, or disposal? [§6518 m.3]			X	This is an agricultural product.
3. Is the substance harmful to the environment? [§6517c(1)(A)(i);6517(c)(2)(A)i]		X		
4. Does the substance contain List 1, 2, or 3 inerts? [§6517 c (1)(B)(ii); 205.601(m)2]				This material is not a pesticide.
5. Is there potential for detrimental chemical interaction with other materials used? [§6518 m.1]		X		
6. Are there adverse biological and chemical interactions in agro-ecosystem? [§6518 m.5]			X	This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem.
7. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§6518 m.5]			X	This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem.
8. Is there a toxic or other adverse action of the material or its breakdown products? [§6518 m.2]			X	This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem.
9. Is there undesirable persistence or concentration of the material or breakdown products in environment?[§6518 m.2]			X	This is an agricultural product used as an ingredient in an organic processed food. It is no longer in the agro-ecosystem.
10. Is there any harmful effect on human health? [§6517 c (1)(A)(i) ; 6517 c(2)(A)i; §6518 m.4]		X		
11. Is there an adverse effect on human health as defined by applicable Federal regulations? [205.600 b.3]		X		
12. Is the substance GRAS when used according to FDA's good manufacturing practices? [§205.600 b.5]	X			
13. Does the substance contain residues of heavy metals or other contaminants in excess of FDA tolerances? [§205.600 b.5]		X		

¹If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

Category 2. Is the Substance Essential for Organic Production? Substance - Rice Starch, non-modified

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
1. Is the substance formulated or manufactured by a chemical process? [6502 (21)]		X		
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]		X		
3. Is the substance created by naturally occurring biological processes? [6502 (21)]		X		Physical manipulation is used to extract starch from the source rice material.
4. Is there a natural source of the substance? [§205.600 b.1]			X	Petitioned substance is from a natural source.
5. Is there an organic substitute? [§205.600 b.1]		X		Petition p.6, #12A “Petition Justification Statement” reports that the manufacturer of the petitioned substance also makes organic rice starch, but the variety of rice needed to make a rice starch that maintains it’s functionality under the petitioner’s processing conditions is not yet available in an organic form. The manufacturer is developing such a variety at his time.
6. Is the substance essential for handling of organically produced agricultural products? [§205.600 b.6]	X			It is an essential ingredient in tube packaged yogurts as part of a freeze-thaw stable thickening system which prevents the yogurt from becoming too runny .
7. Is there a wholly natural substitute product? [§6517 c (1)(A)(ii)]			X	Petitioned substance is a wholly natural product, which is a substitute for chemically-processed modified starches.
8. Is the substance used in handling, not synthetic, but not organically produced? [§6517 c (1)(B)(iii)]	X			
9. Is there any alternative substances? [§6518 m.6]		X		Not at this time, but they are in development. See Petition pp.5-6 “ Petition Justification Statement” and Appendix “Going With the Grain.”
10. Is there another practice that would make the substance unnecessary? [§6518 m.6]		X		

¹If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

Category 3. Is the substance compatible with organic production practices? Substance - Rice Starch, non-modified

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
1. Is the substance compatible with organic handling? [§205.600 b.2]			X	
2. Is the substance consistent with organic farming and handling? [§6517 c (1)(A)(iii); 6517 c (2)(A)(ii)]			X	
3. Is the substance compatible with a system of sustainable agriculture? [§6518 m.7]			X	
4. Is the nutritional quality of the food maintained with the substance? [§205.600 b.3]	X			
5. Is the primary use as a preservative? [§205.600 b.4]		X		
6. Is the primary use to recreate or improve flavors, colors, textures, or nutritive values lost in processing (except when required by law, e.g., vitamin D in milk)? [205.600 b.4]		X		Rice Starch is not being used to create texture lost due to processing, but to create a novel and functionally necessary texture for a very specific type of organic product.
7. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:			X	
a. copper and sulfur compounds;				
b. toxins derived from bacteria;			X	
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?			X	
d. livestock parasiticides and medicines?			X	
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?			X	

¹If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

Category 4. Is the commercial supply of an agricultural substance as organic, fragile or potentially unavailable? [§6610, 6518, 6519, 205.2, 205.105 (d), 205.600 (c) 205.2, 205.105 (d), 205.600 (c)]
Substance - Rice Starch, non-modified

Question	Yes	No	N/A	Comments on Information Provided (sufficient, plausible, reasonable, thorough, complete, unknown)
1. <u>Is the comparative description provided</u> as to why the non-organic form of the material /substance is necessary for use in organic handling?	XX			Petition p. 6, #12 A quotes the manufacturer of an organic form of this product who states that the variety of organic rice available cannot withstand the processing needed to make the petitioner's product. Petitioner purchases a functional system of which this material is a component. Petitioner is working with the manufacturer to develop organic material of appropriate quality for this use.
2. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate form to fulfill an essential function in a system of organic handling?		XX		See #1, above. Petitioner acknowledges that organic rice starch is available.
3. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate quality to fulfill an essential function in a system of organic handling?	XX			See #1, above. Petition quotes the manufacturer of petitioned material, who states that the variety of rice needed to produce the quality of rice starch needed is not yet cultivated organically, but that manufacturer is working on the development of an organic source of this type of rice.
4. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate quantity to fulfill an essential function in a system of organic handling?		XX		Petition gives no information which suggests that the material is available, but in insufficient quantity to fulfill their requirement. See #3, above.
5. Does the industry information provided on material / substance non-availability as organic, include (but not limited to) the following: a. Regions of production (including factors such as climate and number of regions);		X		Petition offers no information indicating a limitation in regions of production which might contribute to a limitation on the production of organic rice starch.
b. Number of suppliers and amount produced;	X			Petition p. 5 #12A, "Petition Justification Statement" describes one manufacturer of organic rice starch.
c. Current and historical supplies related to weather events such as hurricanes, floods, and droughts that may temporarily halt production or destroy crops or supplies;		X		Petition offers no information indicating a weather-related events which might contribute to a limitation on the production of organic rice starch.
d. Trade-related issues such as evidence of hoarding, war, trade barriers, or civil unrest that may temporarily restrict supplies; or		X		There is no information in this petition which indicates that Trade-related issues have limited the supply of organic rice starch.

e. Are there other issues which may present a challenge to a consistent supply?		X		