

## Anonymous Anonymous

AMS-NOP-21-0060; NOP-21-02A. Low-Acyl Gellan Gum (§205.605(b)) I support the proposed addition of low-acyl Gellan Gum to the National List as a nonagricultural, synthetic substance allowed for use in organic handling. The National Organic Standards Board determined that the substance met the criteria under the Organic Foods Production Act of 1990. Not only does it follow the criteria, the substance that it was derived from, High-Acyl Gellan Gum, is already on the National List as a nonsynthetic, nonagricultural substance allowed in organic handling. Low-acyl Gellan Gum is simply a more useful and effective form which, listed by the FDA as a 'food additive permitted for direct addition to food for human consumption at 21 CFR 172.665', does not appear to have any negative effects on human health or the environment. According to the Agricultural Marketing service under the USDA, the requirements needed to be an organic product include: produced using agricultural production practices that foster resource cycling, promote ecological balance, maintain and improve soil and water quality, minimize the use of synthetic materials, and conserve biodiversity. For those that make the argument of maintaining the organic label's integrity and that additives are not organic, there are four separate categories of organic labeling. The highest of which is '100 percent organic' and even this label includes minimally processed farm crops. In this proposed addition to the National List, products made with Low-Acyl Gellan Gum would be allowed as an ingredient in processed organic and "made with organic" products. 'Made with organic' products only require at least 70 percent organically produced ingredients along with restricted ingredients for the nonorganic portion, according to <https://www.ams.usda.gov/rules-regulations/organic/labeling> .