



THE ASSOCIATION FOR
DRESSINGS
& SAUCES

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September 27, 2013

Ms. Michelle Arsenault
Special Assistant
National Organic Standards Board
USDA-AMS-TMP-NOP
1400 Independence Avenue SW
Room 2648-S
Mail Stop 0268
Washington, DC 20250-0268

RE: Notice of Meeting of the National Organic Standards Board
[Docket Number: AMS-NOP-13-0049; NOP-13-04]

Dear Ms. Arsenault:

The Association for Dressings and Sauces (ADS) is the international trade association representing manufacturers of salad dressings, mayonnaise and condiment sauces and the suppliers to the industry. ADS submits the following comments regarding the September 5, 2013 *Federal Register* (78 FR 54617) notice announcing the October 2013 meeting of the National Organic Standards Board (NOSB).

In July 2009, ADS submitted comments to the United States Department of Agriculture (USDA) supporting the addition of gellan gum to Section 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))" of the National List of Allowed and Prohibited Substances (the National List). ADS also supported the addition of tragacanth gum to Section 205.606, Nonorganically Produced Agricultural Products Allowed as Ingredients in or on Processed Products Labeled as "Organic."

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ADS is requesting that both gellan gum and tragacanth gum be maintained on the National List. The use of gellan gum as a stabilizer and thickener is described in 21 Code of Federal Regulations (CFR) 172.665. Gellan gum functions as a thickening agent to produce a wide range of textures in products including sauces. Gellan gum permits manufacturers of salad dressings and sauces to create excellent ingredient suspension or texture with very low use levels. Gellan gum also delivers a very clean mouthfeel with great flavor impact.

The maximum usage levels for tragacanth gum have been established by the FDA in 21 CFR 184.1351, and this ingredient is used to provide emulsion stability, viscosity and texture in salad dressings and sauces.

By maintaining gellan gum and tragacanth gum on the National List, producers of organic salad dressings and sauces have more flexibility in formulating their products while ensuring consistency in the formulation of nonorganic and organic dressings and sauces.

We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Jeannie Milewski". The signature is written in a cursive, flowing style.

Jeannie Milewski
Executive Director