

**Formal Recommendation by the
National Organic Standards Board (NOSB)
to the National Organic Program (NOP)**

Date: October 28, 2010

Subject: Sunset Review of Sodium Hydroxide as listed on §205.605 (b), Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”

Chair: Daniel G. Giacomini

The NOSB hereby recommends to the NOP the following:

Rulemaking Action X
Guidance Statement
Other

Statement of the Recommendation (Including Recount of Vote):

Sodium hydroxide is listed on 205.605(b) with the annotation “prohibited for use in lye peeling of fruits and vegetables.” This substance was scheduled to sunset off the National List in 2012, was reviewed by the NOSB, and a motion was made for the re-listing of this substance at the October 2010 meeting.

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

The Handling Committee’s recommendation covering this material is attached. There were no public written or verbal comments opposing the committee’s recommendation, and the material was recommended for relisting by the full NOSB as shown below.

NOSB Vote:

Moved: Joe Dickson		Second: Steve DeMuri		
Yes: 14	No: 0	Abstain: 0	Absent: 0	Recusal: 0

**National Organic Standards Board
Handling Committee
Sunset Recommendation – 2012
Sodium Hydroxide**

September 7, 2010

List: 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)).”

(b) Synthetics allowed

Sodium hydroxide—prohibited for use in lye peeling of fruits and vegetables.

Committee Summary

Sodium hydroxide is a strong base used as a pH adjuster. The use of a sodium hydroxide dip is the only method of producing a traditional pretzel. Other possible uses include as part of traditional olive production to remove a bitter component of the olive, and as a processing aid in cocoa manufacture. The original technical review notes that sodium hydroxide is also used in the lye peeling of fruits and vegetables; this practice presents an adverse environmental impact due to the combination of spent lye and high BOD (biological oxygen demand) from the waste vegetable matter. Accordingly, this use is not allowed in organic production.

Review of the original recommendation, historical documents, and public comments does not reveal unacceptable risks to the environment, human, or animal health as a result of the use or manufacture of this material. There is no new information contradicting the original recommendation which was the basis for the previous NOSB decision to list this material.

Committee Recommendation(s)

The handling committee recommends the renewal of the following substances in this use category as published in the final rule:

Sodium hydroxide—prohibited for use in lye peeling of fruits and vegetables.

Committee Vote

Motion: Joe Dickson Second: Steve DeMuri
Yes: 6 No: 0 Abstain: 0 Absent: 1