Participating Members:
Angela Ewing (NSF International)    Gay Timmons (Oh, Oh Organic)
David Herbst (Berje Inc.)

Absent Members:
David Bronner (Dr. Bronner’s Magic Soaps)    Tim Kapsner (Aveda Corp.)
Heshi Mahinrod (Hain Celestial Group)    Julie Tyrell (Nature)
Jack Corley (Symrise PureScents)    Joseph Dickson (Whole Foods Market)

Participating Observers
Al Rose (NSF International)     Diana Kaye

Supplemental Materials Referenced During the Meeting
1) OPC-2014-4 – Potassium Sorbate
2) OPC-2014-3 – Phosphates
3) OPC-2012-9 – Sodium PCA
4) Request for Interpretation – 2014-2 - EcoCert
5) OPC-2014-2 – Racemic Lactic Acid
6) Information Paper - IFOAM

Discussion
D.Herbst welcomed the group and called the meeting to order. A.Rose read the antitrust statement and took attendance. Four of the 9 voting members were present (44%), which A.Rose stated did not represent a quorum.

A.Rose read the call for membership in the Organic Personal Care Committee. The Joint Committee on Natural Personal Care is currently looking for members in the Public Health/Regulatory and Trade Association categories. Please refer interested parties to the Joint Committee Chair or Secretariat. He then turned the meeting over to D.Herbst.

D.Herbst began by stating there were 6 items on the agenda, than suggested to the group that they work from the bottom of the list up.

Topic #1 – IFOAM – (Information Paper)
D.Herbst reminded the group that they simply asked us to keep them on the radar for being perspective members of their group. Not just the chemical processing task group, but the entire OPC Joint Committee. G.Timmons added that she had a talk with the representative David Gould after the meeting and said they did indeed want NSF to join. D.Herbst finished by stating there is nothing to work on at the moment. This topic will likely arise again next year, but for now let this sit.
Task Group on Chemical Processes
Teleconference Meeting Summary
April 21, 2014

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**Topic #2 – Racemic lactic acid request – (OPC-2014-2)**

D.Herbst paraphrased the issue paper stating what they seem to be saying about the National List 205.605. Ultimately, they are requesting to have this list on the NSF 305 list because it mimics the racemic balance of the human body. D.Herbst added he didn’t do the research to confirm if what they are saying is correct, however, in certain products, the end result can be different for stereoisomers. For some they are the same. In lactic acid, there appears to be no difference.

G.Timmons added the Ecocert list allows these. If they want compliance, we should then wait until we have an interpretation of the Ecocert list. A.Ewing stated she had completed some research. They claim the L-isomer is in organic form but the D-isomer in the issue paper was not clear. The issue paper unfortunately included mostly information about their specific product not really supporting documents. D.Herbst added that his recommendation would be to go back to the issue proponent and ask them to demonstrate they meet the 0.95 rule. If we look at this from a “friendly or un-friendly chemistry” standpoint, the committee would be more likely to accept this if it meets the 0.95 guidelines. D.Herbst suggested and the group agreed with the following action item

**Action item #1**

A.Rose to write (D.Herbst to approve) response letter that includes: “Please send us a flow chart of your processing for the product you wish us to consider and your justification of why this is 0.95 compliant and on the 205.605 list (below)

§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)).”

The following nonagricultural substances may be used as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s))” only in accordance with any restrictions specified in this section.

(a) Nonsynthetics allowed:

Acids (Alginic; Citric—produced by microbial fermentation of carbohydrate substances; and Lactic).

**Topic #3 – Request for interpretation from Ecocert**

Interpretation request in *italics*

Section 5.3.1 Ecological agricultural-based botano-chemical processes

Processes of manufacturing ingredients:

1. Manufacturing of esters: process of esterification is often followed by purification by distillation with using of hexane. But hexane is not listed as reagents and catalysts allowed to these processes and is a synthetic solvent. Is it possible to use hexane in this case? Same question for synthetic isopropyl alcohol and ethyl acetate.

No discussion; the group unanimously agreed the answer is NO.
2. The chemicals processes oxidation/reduction are not mentioned as authorized chemical processes: **Table 5.1.** These reactions exist in the Nature, would it be possible to accept these reactions?

D.Herbst stated that oxidation/reduction is a synonym for hydrogenation which NSF 305 does allow within its processes. G.Timmons said the response should be yes. D.Herbst and the group agreed the answer is YES.

3. A list of raw materials approved for use in NSF/ANSI 305 standard is published on the website QAI. If an ingredient is already mentioned on this list, is it necessary to obtain the specific questionnaire for non organic ingredient completed by manufacturer?

G.Timmons stated yes; you still have to meet the non-GMO, non solvent extracted requirements however. D.Herbst and the group agreed and the answer is YES.

**About Section 7.5.1 Personal care packaged products**

1. Requirement on label: if the statement “certified to NSF/ANSI 305 by Ecocert Greenlife” is mentioned on label and if the client adds the statement “certified NSF/ANSI 305”. In the standard, no requirement indicates the contrary. Do you agree with that?

The group discussed a bit and stated the question as written on the issue paper was confusing. D.Herbst said maybe this is a copy write question, to which A.Ewing added the certifying body must also be listed. It was then determined that the issue paper is suggesting that the certifying body NOT be on the label. A.Ewing read off section 7.5.1 where it states the mark MAY be listed so there is no contradiction. The group agreed and the answer is YES.

**About Table G.4- Illustrative list of prohibited common ingredients types/classes**

1. Compounds with “PPG” in the ingredient name are prohibited. If the propylene glycol is obtained through authorized processes by NSF/ANSI 305 from natural ingredients, could it be accepted?

D.Herbst best way to answer this is to ask the issue proponent to send a flow chart on the chemistry being proposed. Group agreed.

**Action item #2**
A.Rose to write (D.Herbst to approve) response letter that includes statement for all 4 questions above.
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Topic #4 – Sodium PCA – (OPC-2012-9)

G.Timmons read off the issue. A.Ewing said the proponent wants their product to be added to the “can use” list. She read off how they make it and the group agreed it would be acceptable and would be plausible. If they can demonstrate to the certifier, it would be ok. Further stated, since this ingredient is currently listed on the prohibited list, and now it’s allowed per this process, how can we add this without giving out the proprietary process? D.Herbst asked isn’t there a spot in the standard that states something with the respect that “if one can prove the process works, then the ingredient is acceptable. A.Ewing read off statement in section 1.3 and the group agreed this covers the issue:

1.3 Alternate products or materials

An ingredient of a personal care product varying in design from this Standard’s specification may still qualify under the Standard. While specific materials are stipulated in this Standard, products or components that incorporate alternate materials may be acceptable when it is verified that the product or component meets the applicable requirements of the Standard based on the product’s end use.

Action item #3
A.Rose to write (D.Herbst to approve) response letter that refers the proponent to this section.

Topic #5 – Phosphates – (OPC-2014-3)

D.Herbst read off the first paragraph under background, specifically:

Phosphate ingredients are not addressed in Std. 305. There is no indication as to whether they are allowed or prohibited under Section 5 and/or Annex G. Also, phosphorylation is not listed in Section 5.3.1. It is unclear whether this is intentional or an oversight. Other standards such as Natrue list phosphorylation as an approved process.

D.Herbst added that his recollection is that was intentional when the standard was written and drew attention to phosphate and the general chemistry of phosphorylation. He believes the majority of the committee would be unhappy to add phosphorylation as a process. A.Ewing asked why to which D.Herbst said it has to do with the committee’s willingness to accept what some call “dirty” chemistry. There is no hard science here; it’s just a constant battle with the member of the Joint Committee.

D.Herbst then added that the NOP on the food side clearly have a desire to add calcium and potassium phosphates. Stated he’s not certain how the personal care community lands on this. A.Ewing stated that she continues to get questions from people about why we don’t allow phosphates and her only response is that it’s not in the standard. It’s just not clear and that is why she wrote the issue paper.

D.Kaye asked if these are indeed allowed under the NOP, to which D.Herbst and A.Ewing said yes. A.Ewing then read off the standard as it appears in the issue paper:
7 CFR 205.605 states:

Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))."

The following nonagricultural substances may be used as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s))” only in accordance with any restrictions specified in this section.

(b) Synthetics allowed:
- Calcium phosphates (monobasic, dibasic, and tribasic).
- Phosphoric acid—cleaning of food-contact surfaces and equipment only.
- Potassium phosphate—for use only in agricultural products labeled “made with organic (specific ingredients or food group(s)).” prohibited in agricultural products labeled “organic”.
- Sodium acid pyrophosphate (CAS # 7758-16-9)—for use only as a leavening agent.
- Sodium phosphates—for use only in dairy foods.
- Tetrasodium pyrophosphate (CAS # 7722-88-5)—for use only in meat analog products.

D. Herbst asked D. Kaye whether her company would add phosphates to their products to which she stated not at all. D. Herbst said this is where T. Kapsner would be a good resource to answer as he personally has no idea where these would even be used in the personal care industry. A. Ewing reiterated she gets questions about this so it would seem they are used somewhere, which is why she is seeking clarity. There are no phosphates listed on the prohibited list and no mention anywhere. D. Herbst said if someone wants to suggest phosphates be allowed per Section 1.3 otherwise let this stand. A. Ewing suggested a straw ballot be sent to the task group to see what they think about banning phosphates. D. Herbst agreed.

**Action item #4**
A. Ewing to write language for straw ballot; A. Rose to execute ballot.

**Topic #6 – Potassium Sorbate – (OPC-2014-4)**

A. Ewing said per the Joint Committee meeting in March, she took what C. Valva submitted and turned it into an issue document. That is specifically to use Sodium Benzoate as precedent and to add Potassium Sorbate to Tables 5.2 and G.3. D. Herbst asked D. Kaye her response to which she said her answer is obviously no, she doesn’t agree with adding Potassium Sorbate to the list. D. Herbst added you are probably not in the minority. Group agreed language as written in the issue paper was good and should go directly to Joint Committee ballot.

**Action item #5**
A. Rose to prepare ballot for the Joint Committee. D. Herbst and A. Ewing to approve language and A. Rose to execute
D.Herbst asked if anyone had anything to put on record. L. There was nothing

D.Herbst adjourned the meeting.

**Action Item(s):**

1) A.Rose to write (D.Herbst to approve) response letter regarding the Racemic Acid Issue Paper
2) A.Rose to write (D.Herbst to approve) response letter that includes statement for all 4 questions from Ecocert.
3) A.Rose to write (D.Herbst to approve) response letter that refers the Sodium PCA issue proponent to section 1.3.
4) A.Ewing to write language for straw ballot for phosphates; A.Rose to execute ballot.
5) A.Rose to prepare ballot for the Joint Committee regarding Potassium Sorbate.
   D.Herbst and A.Ewing to approve language and A.Rose to execute