

Annex E

Access Business Group

Within Annex E which is provided as "informative", there are judgements for each of the reference chemical processes under E.2. These judgements exceed the bounds of the standard as following the NOP guidance. Additional notes are provided which are interpretive and do not cite an official source, for example "SLS is controversial". Also there is uneven use of reference bodies. EWG is cited when that organization is providing an interpretation of ingredient safety and is not subject in there report to external review. BDIH is cited when that is the collective judgement of an industry association. Ecocert is cited and is representative of a certifying organization which does endeavor to qualify under the certifying organization criteria in appendix 3. this uneven citing of organizations without noting qualification is unacceptable and there should be a standard of acceptance if any such interpretive judgement is to be presented. Within the scope of the standard as presented, I propose that any such information be limited to NOP recognition.

ABITEC Corporation

Comment:

The reaction temperature listed in the reaction conditions section should be increased to 250°C maximum. Typically in the industry, noncatalyzed esterifications of glycerin and fatty acids for food and cosmetic use are run at that temperature in order to reduce the AV (Acid Value) to less than 0.1. They are also more typically run under vacuum, not pressure, as is stated in the same section.

Proposal:

The reaction temperature should be 250°C maximum and the pressure can be a vacuum of less than 1 mm Hg up to 60 psig.