

**Public Comment, 2021 Fall NOSB meeting
October 13, 2021**

Good afternoon members of the NOSB and NOP. My name is Marie Burcham, and I am the Policy Director for The Cornucopia Institute.

Cornucopia asks that the NOSB re-classify carrageenan as a synthetic before voting to remove the substance from the National List.

When asked to evaluate substances, the NOSB *and* the NOP must consider if that substance would be harmful to human health. Our extensive written comment flags recent research showing that carrageenan causes inflammation. This research has not been debunked. That harm is especially relevant to sensitive populations, including those suffering from chronic illness such as IBS and Crohn's, and other inflammation-mitigated disorders.

The organic marketplace is premised on a higher standard for human health that requires closer scrutiny. While the conventional food system may take years to align with research the organic marketplace requires thoughtful action from NOSB and policymakers.

I would like to take off my Cornucopia policy hat and speak briefly as someone with chronic illness and disability, as a disability-rights advocate. The integrity of the organic label and the standards for human health are deeply personal to chronically ill individuals such as myself. Organic food is justifiably recommended by doctors treating chronic illness: a diet of organic food lowers exposure to substances that fuel inflammation such as pesticides and livestock drugs. Even the smallest dose of these chemicals can affect the day to day functionality and welfare of someone with chronic illness.

It's why the organic label has become a necessary safe haven for so many. While not the original intent of the label, many individuals now rely on organic farms and brands as the source of the only food *they can trust*. Of course, concerns of accessibility and inequity in the organic marketplace ride alongside these issues, and I hope the USDA will have the resources to address this concern soon. In the meantime, I ask the NOSB and the NOP to consider what integrity within the organic food system can mean for people with certain disabilities and chronic illness: a matter of life and death.

Personally, I have a condition called alpha-gal, an increasingly common, acquired allergy to mammal products. Many folks with alpha-gal have compromised health due to and in addition to their severe allergy and seek out organic and vegan alternatives on doctor recommendation. But the same products that are necessary to our well-being can threaten it: Carrageenan cross reacts with this allergy and will often cause life-threatening reactions such as anaphylaxis.

If carrageenan was always named on the ingredient panel or listed as an allergen this would be less concerning—but carrageenan does not always appear on labels. Sensitive individuals cannot guarantee their safety by eliminating processed foods because labeling laws don't require transparency when carrageenan is used as a processing aid, such as in the cream used to make ice cream, or when it is used to filter alcohol. Carrageenan is also used as edible films or to "plump" poultry and other fresh products. There is even the possibility that carrageenan is being used as protective films on organic produce—again, undeclared.

People with alpha-gal and other chronic illnesses like Crohn's should not be disregarded when considering human health concerns. Even though society devalues disabled people, the organic label does not need to follow suit.

As Cornucopia's Director of Policy, I implore both the NOP and the NOSB to consider the actual research, which we reference and summarized in our written comments. Also attached to our comments, you'll find the results of an informational survey tracking how carrageenan affects certain individuals. With more than 24-hundred respondents, it's easy to see patterns arise within this data.

Please re-classify carrageenan as a synthetic and then vote to remove the substance from the National List.