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Michelle Arsenault
Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue SW
Room 2642-S, STOP 0268
Washington, DC 20250-0268

Re: Meeting of the National Organic Standards Board (AMS-NOP-26-0892)

Dear Ms. Arsenault:

The Synthetic Amorphous Silica and Silicates Industry Association (SASSI) appreciates the opportunity to provide comments to the National Organic Standards Board (NOSB) regarding the Fall 2026 meeting and, in particular, the Handling Subcommittee's 2028 sunset review of silicon dioxide under 7 CFR 205.605(b).

SASSI is a nonprofit organization representing manufacturers of synthetic amorphous silica (SAS) and silicates. SASSI is dedicated to advancing and disseminating scientific knowledge about SAS and silicates among consumers, non-governmental organizations, and regulatory authorities. For more than thirty years, SASSI has provided a forum for promoting the safe production and use of SAS and silicates, while supporting and advancing scientific research on the safety and ecotoxicity of these substances.

SASSI appreciates and supports the Handling Subcommittee's determination, as described in the meeting materials for the Fall 2026 meeting, that silicon dioxide is compliant with the Organic Foods Production Act (OFPA) (7 U.S.C. 6518(m) and 6517) and the USDA organic regulations (7 CFR 205.600) and is not proposing removal from the National List. As further support for the Subcommittee's conclusion, SASSI reiterates its oral comments submitted for the Spring 2026 NOSB meeting regarding the safety and technical necessity of SAS in organic production, as well as SASSI's confirmation that SAS used to manufacture food is not an engineered nanomaterial under the National Organic Program's policy memo, and supplements them here.

SASSI acknowledges the concern expressed in the Fall 2026 meeting materials that the current annotation accompanying the silicon dioxide list “is both too restrictive (requiring a commercial availability search that is not likely to yield results for certain products) and too permissive (not aligning with the broader commercial availability search that the Board previously recommended).” In response, SASSI supports the recommendation submitted by the International Food Additives Council (IFAC) that silicon dioxide remain on the National List with an annotation that appropriately recognizes the technical functionality of silicon dioxide and the availability and suitability of organic alternatives. We encourage the NOSB to consider the following points in evaluating the continued listing of silicon dioxide.

I. Silicon Dioxide Remains Necessary for Multiple Technical Functions

As reiterated by stakeholders during the Spring 2026 meeting and in the 2025 Technical Review, silicon dioxide is an important processing aid used in organic food production for functions including defoaming, anticaking, flow enhancement, dispersion, and clarification. SAS is the form of silicon dioxide typically used in food applications.

The current National List annotation permits silicon dioxide as a defoamer and allows other uses when organic rice hulls are not commercially available. SASSI supports maintaining access to silicon dioxide for these uses because the available record demonstrates that rice hulls do not provide equivalent technical functionality across all applications.

In particular, the Fall 2026 meeting materials discuss prior stakeholder comments that, in some applications, rice-hull alternatives may require use levels of 15 to 50 percent compared with approximately 2 percent silicon dioxide. The meeting materials identify limitations associated with rice hulls in applications including anticaking of powders and spice or seasoning blends, dry flavors, use as a flow agent for rice syrup solids, and clarification in beer production.

These differences are not simply a matter of relative use rates. At substantially higher use levels, an alternative may affect the physical properties, processing characteristics, appearance, flavor, nutrition, solubility, or other attributes of the finished product. Accordingly, the availability of a material that can perform a broadly similar function should not, by itself, be considered sufficient to establish that the material is an equivalent alternative to SAS.

SASSI therefore emphasizes that the continued listing of silicon dioxides represents a practical approach, considering commercial availability for alternatives that provide equivalent technical functionality for the specific application.

II. SASSI Supports IFAC’s Proposed Revision to the Silicon Dioxide Annotation

SASSI recognizes that the NOSB continues to request feedback on developing an annotation for the silicon dioxide listing that recognizes both technical functionality and commercial

availability when evaluating alternatives to silicon dioxide. Accordingly, SASSI supports IFAC's proposed revision to the silicon dioxide annotation and welcomes the following language:

“Permitted as a defoamer. Allowed for other uses when organic rice hulls or other suitable organic alternatives are not commercially available or do not provide equivalent technical functionality.”

This approach appropriately preserves the preference for organic alternatives while recognizing that substitution must be evaluated based on actual technical performance.

The current record demonstrates why this distinction is important. The question is not simply whether an organic or nonsynthetic substance exists that performs a generally comparable function. Rather, the relevant question is whether that alternative is commercially available and can perform the necessary technical function in the particular application without materially compromising processing or product characteristics.

SASSI therefore encourages the NOSB to recommend continued listing of silicon dioxide and to adopt an annotation that expressly recognizes both commercial availability and equivalent technical functionality.

III. Conventional Food-Grade SAS Should Not Be Treated as an Engineered Nanomaterial

SASSI also reiterates that food-grade SAS is not an engineered nanomaterial and does not meet the NOPs definition for an engineered nanomaterial.

Food-grade SAS consists of aggregated and agglomerated structures derived from nanoscale primary particles. All currently known SAS powders are placed on the market as micron-sized agglomerates. Regulatory authorities distinguish these materials from engineered nanomaterials intentionally designed to express novel nanoscale properties.

SASSI therefore supports the Fall 2026 meeting materials approach, based on the 2025 Technical Review, that the NOSB's longstanding position on silicon dioxide remains appropriate.

Silicon dioxide has been included on the National List since 2001, and the NOSB has previously recommended its continued listing during multiple sunset reviews. The current record documents its established use in organic processing and the history of the National List annotation.

The Fall 2026 review establishes that silicon dioxide remains technically necessary to and safe in the production of organic foods.

For these reasons, SASSI supports the continued listing of silicon dioxide under 7 CFR 205.605(b). We further support an annotation that provides a clear, performance-based mechanism for determining when silicon dioxide may be used for applications other than defoaming, recognizing the long history of safe use in many other food applications.

SASSI appreciates the opportunity to provide these comments and looks forward to continuing to work with the NOSB and USDA on issues affecting the safe, consistent, and technically appropriate use of ingredients and processing aids in organic food production.

Sincerely,

Candy Reynolds-Cummings, Chair

Keleigh McAllister, Vice Chair

Synthetic Amorphous Silica and Silicates Industry Association