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Jungbunzlauer

Organic Statement

Dear Customers,

The following Jungbunzlauer products:

Citric Acid
Lactic Acid
Tricalcium Citrate
Tripotassium Citrate
Trisodium Citrate
Xanthan Gum
Glucono-delta-Lactone

are manufactured by fermentation of carbohydrates. The products undergo several purification steps and are finally obtained in their highly pure form.

Jungbunzlauer confirms that neither the raw materials we use for the manufacture of our products, nor the products themselves, are treated with ionizing radiation. Also, sewage sludge is not used in our production process and handling.

The National Organic Program specifies a "National List of Approved and Prohibited Substances". Relevant excerpts of the National Organic Program are attached which indicate that the above mentioned products are allowed substances when meeting the requirements of the sections.

Please refer to the National Organic Program for further clarification. We advise companies using this information to discuss this matter with their own regulatory and label experts.

Best Regards,

Jungbunzlauer Technical Service

*Excerpts from Title 7 - Part 205 - National Organic Program

§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling.

To be sold or labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," the product must be produced and handled without the use of:

- (a) Synthetic substances and ingredients, except as provided in Sec. 205.601 or Sec. 205.603;*
- (b) Nonsynthetic substances prohibited in Sec. 205.602 or Sec. 205.604;*
- (c) Nonagricultural substances used in or on processed products, except as otherwise provided in Sec. 205.605;*
- (d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in Sec. 205.606;*
- (e) Excluded methods, except for vaccines: Provided, That, the vaccines are approved in accordance with Sec. 205.600(a);*
- (f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and*
- (g) Sewage sludge.*

§ 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 (Citric—produced by microbial fermentation of carbohydrate substances; and Lactic) Glucono-delta-lactone – production by the oxidation of D-glucose with bromine water is prohibited.

(b) Synthetics allowed:

*Calcium citrate
Potassium citrate.
Sodium citrate.
Xanthan gum.*