



May 4, 2026

Docket Number: AMS-NOP-25-0914

These comments, made on behalf of OrganicEye and our members around the country, are submitted for consideration by the National Organic Standards Board (NOSB) members in preparation for their deliberations during the May 2026 semiannual meeting.

OrganicEye is a tax-exempt public charity engaged in research and educational activities benefiting all organic stakeholders (farmers, ethical businesspeople, and consumers). OrganicEye is best known as an organic industry watchdog.

### **Handling Subcommittee - Carrageenan**

I have personally been fighting to remove carrageenan from the list of approved materials for use in organic food for nearly two decades, first while running The Cornucopia Institute and for the last six years as Executive Director of OrganicEye.

### **History:**

Peer-reviewed independent research, mostly funded by the National Institutes of Health, concluded that carrageenan was a likely carcinogen. The last time we checked, studies intimating it was safe were exclusively funded by industry interests and/or conducted by researchers with a history of financial backing from interested parties.

Organics should be the last bastion of safe food. If there's a question about safety, the NOSB legally needs to err on the side of being conservative when the health of the American public could be impacted. There's more than enough data to conclude there's a legitimate reason for public concern.

After this was initially brought to the public's attention, carrageenan was removed from the product formulations of most major brands like Stonyfield, Organic Valley, and Horizon. Virtually no one in the industry was using it, and some marketers were proclaiming "no carrageenan" on their labels as a value-added attribute.

The NOSB voted to remove carrageenan from the national list in 2016 but was overruled by the USDA Secretary.

It was reapproved at its last Sunset, without the lead NOSB member at the time mentioning virtually any of the history or background you are about to review. So much for *Stare decisis*.

### **Additional background:**

My concern first began upon discovering the numerous peer-reviewed and published articles by independent scientists whose findings indicated food-grade carrageenan, a seaweed derivative, caused intestinal inflammation, including its relationship to developing cancer. These investigations have continued to mount up with more published in 2024 and 2025.

In 2012, I facilitated testimony at the spring NOSB meeting by a physician-researcher from the University of Illinois, Dr. Joanne Tobacman, who had long studied the impacts of carrageenan on human health. Her research was funded by the National Institutes of Health, whereas research provided by the industry suggesting carrageenan was safe was exclusively funded by agribusiness interests.

The lead NOSB member on the material, who held the "scientist" position on the board, attacked Dr. Tobacman's credibility. The member in question had a long-time affiliation with the nation's largest organic certifier, CCOF. She succeeded in having the material relisted, promising that it would be reevaluated in five years. I asked at the time how many people might contract cancer in the interim.

Five years later, after most major companies like CROPP/Organic Valley and Dean Foods/Horizon had removed carrageenan from their product formulations and were no longer actively lobbying the board for its retention, the NOSB voted to rescind its approval.

That recommendation was overruled by Sonny Perdue, USDA Secretary during the first Trump administration. (Because it was deemed a "natural" material, the Secretary had the statutory authority to ignore the NOSB recommendation, which would not have been the case if it were a synthetic substance.)

Even more disturbing, a subsequent NOSB panel ignored the previous research and decision of the panel and added it back to the approved list without thoroughly exploring the past objections.

Flash forward to 2026. In addition to concerns about carrageenan's carcinogenic properties, recent research continues to point to other risks, including diabetes, and increased hazards for those who suffer gastrointestinal maladies, including irritable bowel syndrome (IBS) and Crohn's disease.

- [Dietary Carrageenan Amplifies the Inflammatory Profile, but not Permeability, of Intestinal Epithelial Cells from Patients with Crohn's Disease](https://doi.org/10.1093/ibd/izae306) (2025, <https://doi.org/10.1093/ibd/izae306>): This study supports the adherence to a diet low in processed foods and emulsifiers — including carrageenan — for patients with IBS, especially during active inflammation.
- [Carrageenan and insulin resistance in humans: a randomized double-blind cross-over trial](https://doi.org/10.1186/s12916-024-03771-8) (2024, <https://doi.org/10.1186/s12916-024-03771-8>): This study suggests effects of carrageenan treatment on insulin sensitivity in those who have a higher BMI. The results warrant caution with carrageenan-containing foods, especially in individuals who are prone to develop type 2 diabetes.
- [Food additive emulsifiers and cancer risk: Results from the French prospective NutriNet-Sante' cohort](https://doi.org/10.1371/journal.pmed.1004338) (2024, <https://doi.org/10.1371/journal.pmed.1004338>) Researchers studied 92,000 adults of the French NutriNet-Sante' cohort without prevalent cancer and observed associations between higher intakes of carrageenans and mono- and diglycerides of fatty acids with overall, breast, and prostate cancer risk. These results provide new epidemiological evidence on the role of emulsifiers in cancer risk and need replication in other populations.
- [Carrageenan in the Diet: Friend or Foe for Inflammatory Bowel Disease?](https://pubmed.ncbi.nlm.nih.gov/articles/PMC11174395/) (2024, <https://pubmed.ncbi.nlm.nih.gov/articles/PMC11174395/>) Potentially pro-inflammatory properties, increasing intestinal permeability, impairing glucose tolerance, and the changes in the composition of the intestinal microbiome were observed in IBS patients.
- [Carrageenan as a Potential Factor of Inflammatory Bowel Diseases](https://pubmed.ncbi.nlm.nih.gov/articles/PMC11085445/#sec7-nutrients-16-01367) (2024, <https://pubmed.ncbi.nlm.nih.gov/articles/PMC11085445/#sec7-nutrients-16-01367>) Studies have indicated a direct link between diet and intestinal inflammatory states and damage to the integrity of the intestinal membrane and reduction of the mucin layer. The researchers conclude that most vulnerable to the harmful effects of carrageenan are individuals with inflammatory bowel diseases, including Crohn disease (CD) and ulcerative colitis (UC).

Organic should be the last bastion of natural and safe food for families and we should operate under the "precautionary principle." That's why Congress created the NOSB in the first place. Carrageenan is approved for use in conventional food, but the blessing

from the Food and Drug Administration is not good enough for many of us who eat an exclusively organic diet.

**Because of the seriousness of the potential negative health implications, we respectfully ask that the NOSB act immediately to ban carrageenan from organic food production by listing it as a "prohibited natural" material in addition to removing it from the National List at this Sunset.**

Carrageenan can change the intestinal microflora and degrade and break down the mucous barrier, causing an inflammatory reaction. Therefore, if action is not taken, I would ask again: How many people might contract cancer – or develop type 2 diabetes – in the interim? How many people with ulcerative colitis and Crohn's disease will suffer further and increasing debilities? And are we condemning our children to a future of obesity and/or cancer?

Respectfully submitted,

Mark A. Kastel  
Executive Director  
OrganicEye