

The Cornucopia Institute – Oral Comments for Spring 2026  
Oral comment online webinar 5/5/2026

Good morning members of the NOSB and NOP. My name is Kestrel Burcham. I am an attorney and the Policy Director for The Cornucopia Institute.

I have two topics I want to address to the NOSB today: Anti-organic propaganda and carrageenan.

Anti-organic propaganda currently runs rampant, **filled with misinformation** about what organic “allows” and whether it’s a meaningful label or just a marketing gimmick. While we know that Certified organic that organic principles are science-backed, that message is being muddied by influencers fueling the anti-organic flames.

We need to address this propaganda with a more concerted effort. It’s not enough to stay in our “pro-organic” bubble, because this misinformation is having a real-world impact. Cornucopia hears from organic farmers regularly that anti-organic propaganda is impacting their livelihoods. We also hear from consumers who need high-integrity organic food that are concerned the label is being watered down due to the spread of this misinformation.

Better communications about the research-backed benefits of organic farming and the regulatory framework is needed. Support for the NOP is needed so that they can continue with robust enforcement and the “continuous improvement” of the regulations. To that end, it’s important that transparency, legal standards, and regulatory oversight isn’t watered down or limited.

With respect to carrageenan, OFPA requires that organic foods conform to *a higher standard* for human safety than other foods. Organic food also stands apart from other labels in that it asks questions about acceptable risk and consumer transparency by its very design.

Cornucopia does not believe that the current scientific evidence on the human health impacts of food-grade carrageenan remains “mixed.” If you remove studies that have **conflicts of interest** with the carrageenan industry, a pattern of human-health concerns is clear.

Carrageenan has been shown to trigger severe intestinal inflammation, among other harmful human health effects. Much of the research in *both animal and human models* shows negative health effects at dosing levels *much lower than those levels found in the typical Western diet*. This is concerning! The evidence summarized by the 2026 Technical Review further reiterates that carrageenan does cause adverse human health effects.

Cornucopia has developed an extensive internal reference document that summarizes relevant human-health research papers published since 2017 – with the conflicts of interest clearly laid out – which can be shared with the NOSB if it would be at all helpful.

Carrageenan should be **re-classified** as a **synthetic substance** and *removed from the National List* due to the substance not meeting the requirements for use in organic food and handling.

*[Add if there is time: Trying to fit an organic model of farming into a conventional food system has always come with flaws. Organic should not look to conventional food systems for answers: it should be the reverse. Especially in an age of increasing food insecurity, climate stressors, and social unrest. The same must be true for how we address this flood of anti-organic propaganda.]*

Thank you for your time and efforts safeguarding the organic label for us all.