BEYOND PESTICIDES
701 E Street, SE ▪ Washington DC 20003
202-543-5450 phone ▪ 202-543-4791 fax
info@beyondpesticides.org ▪ www.beyondpesticides.org

October 12, 2016

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

**Re. HS: Tartaric acid**

These comments to the National Organic Standards Board (NOSB) on its Fall 2016 agenda are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

In reviewing this substance, the NOSB must apply the criteria in the Organic Foods Production Act (OFPA), that its use—
(i) would not be harmful to human health or the environment;
(ii) is necessary to the production or handling of the agricultural product because of the unavailability of wholly natural substitute products; and
(iii) is consistent with organic farming and handling.[1]

## Environmental and health impacts

As listed on the National List, tartaric acid must be made from grape wine. The evaluation of tartaric acid must thus take into consideration the use of pesticides in the non-organic production of grapes and the availability of organic grape wine for this purpose, as well as the potential availability of the tartaric acid from organic grape wine if the demand existed. The following impacts are derived from the Beyond Pesticides web-based database *Eating with a Conscience*.[2]

[1] OFPA §6517(c)(1)(A). Further details at OFPA §6518(m).
[2] http://www.beyondpesticides.org/resources/eating-with-a-conscience/choose-a-crop?foodid=19.

## Grapes

**California Farmworker Poisonings, 1992–2010**: 1,234 reported (CA acreage: 796,000). These poisoning incidents only represent the tip of the iceberg because they only reflect reported incidents in one state. It is widely recognized that pesticide incidents are underreported and often misdiagnosed.

**Pesticide Tolerances —Health and Environmental Effects:** The database shows that while grapes grown with toxic chemicals show low pesticide residues on the finished commodity, there are 124 pesticides with established tolerance for grapes, 38 are acutely toxic creating a hazardous environment for farmworkers, 108 are linked to chronic health problems (such as cancer), 20 contaminate streams or groundwater, and 99 are poisonous to wildlife.

**Pollinator Impacts:** In addition to habitat loss due to the expansion of agricultural and urban areas, the database shows that there are 34 pesticides used on grapes that are considered toxic to honey bees and other insect pollinators. For more information on how to protect pollinators from pesticides, see Beyond Pesticides' BEE Protective webpage.

- This crop is dependent on pollinators.
- This crop is foraged by pollinators.

## Conclusion

The HS should investigate whether tartaric acid from organic grape wine is available or would be available if this listing did not discourage its use. Since tartaric acid is a waste product from winemaking, its sale could provide additional revenue to organic vintners.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors