



# BEYOND PESTICIDES

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

March 29, 2017

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, CS: Marine Materials**

These comments to the National Organic Standards Board (NOSB) on its Spring 2017 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.

Beyond Pesticides supports proposals by the Handling Subcommittee and Crops Subcommittee to specify the particular seaweeds used in aquatic plant listing on §205.605 and §205.606 and aquatic plant extracts listing on §205.601(j)(1). Specificity in listing of species makes the regulations more precise and allows better review of Organic Foods Production Act (OFPA) criteria by the NOSB. For the same reasons, we support the recommendation that NOP develop guidance on the use of the word “kelp” as used in organic production and wild harvesting.

The motions to clarify the identity of marine plants used in organic production and handling are an important first step to National List entries that comply with OFPA. The NOSB should also create criteria that prohibit use of marine algae that are threatened by overharvesting or whose harvest is ecologically disruptive.

As indicated in the Fall 2016 discussion document, some species included under a common name may be threatened or be part of a threatened community. In those cases, it is appropriate to exclude the threatened species or population with an annotation. The subcommittee also mentions the fact that algae accumulate toxins –including heavy metals and radiation. It is therefore necessary that some listings would require that algae be taken from specific locations (or not taken from others.)

An alternative would be the elimination of all listings for marine algae, and require that carrageenan, agar, alginic acid, alginates, and beta carotene be made from algae that are

certified organic. The requirements for wildcrafted or cultivated organic seaweeds would then include conservation and toxics avoidance.

Another issue that was addressed in the Fall 2016 discussion document is the problem of introduced pests of native species through cultivation. In our Fall 2016 comments on carrageenan, for example, we pointed out that in addition to the problem of overharvesting of *Chondrus* (cold water species), the cultivation of *Kappaphycus* in warm water helps to spread ice-ice disease of seaweeds.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a long horizontal stroke at the end.

Terry Shistar, Ph.D.  
Board of Directors