



BEYOND PESTICIDES

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

March 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: Tocopherols Annotation

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.

In light of evidence that nonsynthetic tocopherols are available, the Handling Subcommittee (HS) is considering listing tocopherols as allowed nonsynthetics on §205.605(a). However, for this meeting, the HS proposes to hold off on adding tocopherols to §205.605(a) until it can collect public comment. Meanwhile, the HS passed a motion to change the annotation for Tocopherols listed at 205.605(b) of the National List: “Derived from vegetable oil when rosemary extracts are not a suitable alternative” to the following annotation – “Derived from plant oils. Non-synthetic or organic tocopherols are to be used when commercially available.”

While it makes sense to limit use of synthetic tocopherols, and require that “Non-synthetic or organic tocopherols are to be used when commercially available,” nonsynthetic tocopherols are not currently listed on §205.605(a), so this proposal is untimely. Therefore, we suggest that this motion be tabled until a listing on §205.605(a) is approved.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors

DRAFT