



BEYOND PESTICIDES

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October 2, 2015

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. CS: Lignin sulfonate petition

These comments to the National Organic Standards Board (NOSB) on its Fall 2015 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.

The Organic Trade Association (OTA) has petitioned to remove the listing of lignin sulfonate at §205.601(l) as a flotation agent for postharvest handling because it is no longer needed. We support the OTA petition.

The CS checklist is inadequate.

The Crops Subcommittee has included an evaluation criteria checklist in its proposal that is incomplete. We believe that a checklist should provide documentation and/or citations. The X's in the boxes without citations would suggest to the public that the subcommittee did not adequately review the information necessary to make a determination. As one example, the checklist indicates "No" for the first two questions, "Is there a probability of environmental contamination during use or misuse?" and "Is there a probability of environmental contamination during, manufacture or disposal?" No citations. But the 2011 Technical Review clearly documents adverse impacts on waterways and aquatic organisms. We hope that there is agreement that the documentation supporting CS and subcommittee recommendations should be thorough and carefully completed so that the full NOSB can make fully informed decisions and create a complete record for the public and future NOSB's. We appreciate the tremendous workload and efforts of board members and, at the same time, hope the record captures the full thinking and findings of the subcommittee.

Lignin sulfonate manufacture and use results in environmental damage.

Lignin sulfonate is a by-product of paper pulping. Pulp and paper is the third largest industrial polluter to air, water, and land in both Canada and the United States, and releases well over 100 million kg of toxic pollution each year.¹ Lignin sulfonate used in floating pears may contaminate waterways via discharges without careful treatment, resulting in high biological oxygen demand as it decomposes, which depletes oxygen for aquatic animals.²

Lignin sulfonate is not necessary.

As stated in the technical review and the petition to remove lignin sulfonate submitted by the Organic Trade Association, there are several alternative materials available, including some natural materials. Floatless systems are also in use.³

Conclusion

Since lignin sulfonate does not meet the OFPA criteria regarding protection from health and environmental harm or essentiality, we recommend that it be removed from the National List.

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors

¹ TR lines 239-258.

² TR lines 332-337.

³ TR lines 397-413. OTA petition to remove lignin sulfonate.