



# 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: Sulfuric Acid 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.

Beyond Pesticides supports the Crops Subcommittee (CS) proposal to deny the petition to list sulfuric acid on §205.601 “as a solubilizing agent to make micronutrients more available for plant uptake” because it is hazardous to human health and the environment, is not necessary, and is inconsistent with organic practices. The NOSB has already denied three petitions in the past for listing sulfuric acid, and should deny this petition as well.

### **Sulfuric acid is hazardous to human health and the environment.**

As the CS has documented, sulfuric acid is a strong corrosive acid. According to the Technical Review, “Facilities that manufacture sulfuric acid are among the primary sources of sulfuric acid releases to the environment,” which contributes to acid rain.

### **Sulfuric acid is unnecessary and does not meet the essentiality criterion.**

Micronutrients are already available to organic producers in both natural and synthetic forms, the latter by virtue of the listing of micronutrients at §205.601(j):

- (6) Micronutrients—not to be used as a defoliant, herbicide, or desiccant. Those made from nitrates or chlorides are not allowed. Soil deficiency must be documented by testing.
- (i) Soluble boron products.

(ii) Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt.

**Sulfuric acid is inconsistent with organic practices and does not meet the compatibility criterion.**

The use of sulfuric acid to make synthetic nutrients more available to plants is inconsistent with organic practice, which requires growers to feed the soil, rather than plants. As the CS says, [T]he process of treating micronutrients with sulfuric acid as described in this petition will produce forms of micronutrients that are highly refined and designed to spoon-feed plants in ways that circumvent the natural soil biological processes central to organic farming systems, as described in the organic standards definition of organic production (205.2): “A production system that ...[integrates] cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.”

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar".

Terry Shistar, Ph.D.  
Board of Directors