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

April 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. HS: Polyalkalene Glycol Monobutyl Ether (PGME)

These comments to the National Organic Standards Board (NOSB) on its Spring 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 groups around the world.

We thank the Handling Subcommittee (HS) for the thorough reassessment of PGME in response to public comments at the spring 2014 NOSB meeting, and we support the subcommittee's proposal to deny the petition for the use of PGME in boiler water in the manufacture of organic feed pellets.

Since the HS states that PGME meets Organic Foods Production Act (OFPA) criteria for lack of harm to human health and the environment, we repeat findings that we submitted last year. Although the petition portrays PGME as innocuous, and the TR indicates that only the lowest molecular weight (MW) forms are toxic, the scientific literature and test results submitted to EPA indicate otherwise. The petition requests listing for MW greater than 1500. An acute inhalation study found that PGME with a MW of 4000 was acutely toxic to test animals. "Significant pathological changes were limited to the lungs and were more common in animals which died prior to scheduled sacrifice. Grossly, these lung changes consisted of red discoloration, edema, emphysema, and surface irregularities. Microscopic findings in the lungs included acute congestion and hemorrhage and, less commonly, acute interstitial inflammation."[1]

[1] Hoffman GM, Newton PE, Thomas WC, Birnbaum HA, Kennedy GL Jr., 1991. Acute inhalation toxicity studies in several animal species of an ethylene oxide/propylene oxide copolymer (UCON 50-HB-5100), Drug Chem Toxicol. 14(3):243-56.

Data submitted to EPA by Union Carbide show that PGME up to MW of 1590 causes convulsions in test animals.[2] Data submitted to EPA by Union Carbide showed that some PGME forms with MW above 1500 were among those that were highly toxic.[3] Data submitted to EPA by Union Carbide show eye injury, delayed deaths, and lethal dermal exposure.[4]

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors

[2] http://yosemite.epa.gov/oppts/epatscat8.nsf/ALLIDS/612615DD19EBC8E085256930004CD868/$FILE/88920010360.pdf?OpenElement

[3] http://yosemite.epa.gov/oppts/epatscat8.nsf/ALLIDS/EDA417CD065152FA852571AF006B9A43/$FILE/88920000105.pdf?OpenElement

[4] http://yosemite.epa.gov/oppts/epatscat8.nsf/ALLIDS/78D0F9E3F0E645108525720C00685434/$FILE/889200109002.pdf?OpenElement