



BEYOND PESTICIDES

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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: Report on Contaminated Inputs

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.

Unfortunately, organic production is embedded in a world that is increasingly polluted, and many of the pollutants persist much longer than we would like. We can't just do the right thing without knowing what others are doing. We support research into all of the contaminants and pathways mentioned in this report. We support research into means of preventing the contamination, which we believe must include restrictions on the way other people use many of those materials. Organic farmers are good neighbors —they take care of other people's waste, and they create buffer zones and havens of biodiversity that help their non-organic neighbors. Protecting organic farms from outside contamination will require a gatekeeper looking over what comes onto the farm, but it should also require more responsibility for those who use potentially dangerous materials. It all starts with gathering information, and we are happy to see that the NOSB is taking the first steps.

We have a few substantive comments to add.

- We agree with the approach outlined by the Crops Subcommittee (CS), of addressing this complicated issue based on feedstocks and pathways. And while we hope that the CS gathers information on new feedstock/pathways —that is new rows for the spreadsheet—we believe that the best next step is to choose one feedstock and follow it through to making some recommendations.
- In looking at the first few feedstocks, it appears that GMO grasses, alfalfa, and wheat straw are potential contaminants of lawn/yard waste and manures.

- The column for “avoidance” is pretty much limited to “Use organic source.” If using organic sources was a practical solution, then the chances are that we would not have this problem. Secretary Vilsack suggests that talking with neighbors is a solution to GMO drift. We disagree, but it is one part of a solution to talk with the farmer who is the source of the poultry manure to determine whether arsenic is fed to the chickens. Certifiers might have a list of questions to ask about off-farm sources.
- Finally, we have some articles on bioremediation to add to your database:
Ahalya, N., Ramachandra, T. V., & Kanamadi, R. D. (2003). Biosorption of heavy metals. *Res. J. Chem. Environ*, 7(4), 71-79.
<http://wgbis.ces.iisc.ernet.in/energy/water/paper/biosorption/Biosorption.pdf>
Elless, M. P., Poynton, C. Y., Willms, C. A., Doyle, M. P., Lopez, A. C., Sökkary, D. A., ... & Blaylock, M. J. (2005). Pilot-scale demonstration of phytofiltration for treatment of arsenic in New Mexico drinking water. *Water research*, 39(16), 3863-3872.
<http://www.sciencedirect.com/science/article/pii/S0043135405004136>

We urge the subcommittee and the Board to address this issue comprehensively, but begin releasing recommended guidelines in stages, as quickly as possible. Organic integrity and the consumer trust necessary to grow the sector require grower and consumer confidence that land managers and policy makers are doing all they can to monitor and protect against organic contamination by prohibiting substances. We recommend the extensive database of pesticide-related information on the Beyond Pesticides website.

Finally, this is a perfect example (not the only one!) of an issue where the NOSB could benefit from the implementation of the unanimously-passed NOSB recommendation (Spring 2013) for an open docket to receive public comment and input on an ongoing basis, informing Subcommittee work. Researchers, growers, certifiers, and other members of the public should be encouraged to add to the knowledge base represented by the table in the recommendation.

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors