



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. CS: Exhaust gas

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 around the world.

The proposed use of exhaust gas to kill rodents in their burrows meets none of the OFPA criteria. It poses environmental and health hazards, is not necessary for organic production, and it is incompatible with organic and sustainable agriculture.

Exhaust gas poses environmental and health hazards.

Releases of exhaust gas contribute to a number of environmental problems. According to the Technical Review (TR), "Specifically, exhaust gas emissions contribute to air pollution, and four of its components (particulate matter, carbon monoxide, nitrogen oxides and sulfur dioxide) are criteria pollutants according to US EPA." More importantly, other organisms inhabit the burrows made by rodents. Again quoting from the TR,

Exhaust gas treatments in rodent burrows will lead to the poisoning of a wide array of non-target wildlife, including endangered and sensitive species, if present in treated areas. Many species of reptiles and amphibians, as well as burrowing owls, use the burrows of ground squirrels and other burrowing animals (CBD, 2011). In addition, non-target rodents, rabbits, raccoons, fox, weasel and skunk may reside in rodent burrows (USDA, 1997). According to the Center for Biological Diversity, endangered and sensitive species such as the Alameda whipsnake, California red-legged frog, San Francisco garter snake, San Joaquin kit fox, western burrowing owl and California tiger salamander often occupy rodent burrows and could be killed as a result of exhaust gas/carbon monoxide treatments (CBD, 2011).

The use of exhaust gas as a rodenticide is unnecessary.

Alternatives include traps, barriers, natural predation, and other physical control methods.

The use of exhaust gas as a rodenticide is incompatible with organic practices.

Exhaust gas does not belong in any of the categories of allowed synthetic inputs in OFPA §6517(c)(1)(B)(i). Although it may contain sulfur, sulfur is not the active ingredient.

Conclusion

Therefore, we support the Crops Subcommittee proposal to deny the petition to list exhaust gas as a rodenticide on §205.601.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is written in a cursive style with a horizontal line extending to the right.

Terry Shistar, Ph.D.
Board of Directors