



BEYOND PESTICIDES

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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: Sunset 2016: Hydrogen chloride

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.

Beyond Pesticides supports the relisting of hydrogen chloride in recognition of the lack of alternatives of organic cotton growers. However, in view of the extreme hazard posed by gaseous hydrogen chloride, we ask the NOSB to put its voice behind support for research and development of alternative methods of delinting cotton seed in preparation for planting.

1. Hydrogen chloride poses hazards for humans and the environment.

Hydrogen chloride, the gaseous form of hydrochloric acid, is extremely corrosive, with the ability to kill any cell it contacts. According to the Agency for Toxic Substances and Disease Registry, "People working in occupations in which hydrogen chloride is used have the highest risk of being exposed to this compound. . .Exposure to high levels can result in corrosive damage to the eyes, skin, and respiratory tissues, and could lead to pulmonary edema and even death in extreme cases." The fact that the risk accrues to workers other than organic farmers should not cause us to ignore the extreme danger of working with hydrogen chloride.

Hydrogen chloride also has the potential to cause damage to the soil and other organisms in the case of a spill.

2. Hydrogen chloride is not compatible with organic and sustainable agriculture.

Since it is a by-product of the formation of chlorinated and fluorinated organic compounds, the use of hydrogen chloride supports the chlorine chemical industry, which is responsible for pollution by some of the most toxic chemicals known, including dioxins and PCBs. The use of a

dangerous chemical, which poses extreme hazards to workers, is incompatible with organic and sustainable practices and we should be aggressively moving to phase it out of organic systems.

3. Unfortunately, hydrogen chloride at this point in time is essential for organic cotton production in the United States.

It is our understanding, from conversations with a representative of the Texas Organic Cotton Marketing Cooperative, that organic cotton growers in the U.S. currently do not have a lot of choice about how their seed is prepared for planting. U.S. organic cotton production is small and concentrated in west Texas. Cotton growers are limited to using the technology available in that area. There is, however, on-going research into the development of mechanical delinting mechanisms that would eliminate the need for hydrogen chloride. The NOSB should support these alternatives by making alternatives to hydrogen chloride a research priority.

This is the kind of “minor” use that deserves special support. It appears to us that there are alternative technologies ripe for development, and that very little is needed to move them into the stage of being able to meet the demand of organic cotton growers. Therefore, it is highly unlikely that support for this material will continue indefinitely.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry Shistar".

Terry Shistar, Ph.D.
Board of Directors