



BEYOND PESTICIDES

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November 4, 2011

National Organic Standards Board
Fall 2011 Meeting
Savannah, GA

Re. Comments on Peracetic Acid Sunset

Dear Board Members:

These comments are submitted on behalf of Beyond Pesticides. 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, 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 support the recommendation of the Crops Committee to allow the continued use of peracetic acid as an irrigation cleaner, but oppose its use to control fireblight bacteria. As we will explain below, the use for fireblight does not meet the requirements of the Organic Food Production Act—it does not fit into a category of allowed synthetic inputs, its health and environmental effects are not sufficiently known, and it is inconsistent with a system of organic and sustainable agriculture.

1. The use does not fit within any of the allowable uses of synthetic inputs into organic production.

7 U.S.C. §6517 lays out requirements for the National List. Subsection (c)(1)(B)(i) lists the categories of active materials that may be allowed.¹ The use of a synthetic oxidizing agent to kill fireblight bacteria falls under none of these categories. The only use of peracetic acid that falls under any of the allowable categories is the use as an equipment cleaner.

2. Peracetic acid is hazardous to humans and the environment.

¹ (B) the substance -

(i) is used in production and contains an active synthetic ingredient in the following categories: copper and sulfur compounds; toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers;

Peracetic acid is a strong oxidizing agent —stronger than chlorine dioxide and sodium hypochlorite, but not as strong as ozone— and is on EPA’s Extremely Hazardous Substances list. (TAP p. 2) Its use as an irrigation cleaner probably poses fewer risks than the poorly defined use pattern for control of fireblight. It is not clear how peracetic acid is used for fireblight control. Is it sprayed onto trees or wiped onto lesions? As noted in the Technical Advisory Panel review (p. 5), “[T]he immediate effect on soil organisms would be broad-spectrum and, if mishandled, potentially violent.”

3. Although there is a need for materials and strategies to address fireblight, peracetic acid is not an appropriate material.

Because of its strength as an oxidizing agent and the potential for damage to soil organisms, peracetic acid should not be sprayed onto trees. Technical Advisory Panel members did not think it would be effective against fireblight, and no new information has been presented that supports this use.

4. The use of peracetic acid for control of fireblight is not compatible with a system of organic and sustainable agriculture.

As mentioned above, peracetic acid does not fit into any of the allowed categories of synthetic inputs into organic production. As a strong oxidizer, its use in a way that allows contact with soil organisms and other noncontact organisms threatens rather than supports biodiversity in the agroecosystem.

We note that the NOSB’s previous (2009) recommendation to allow peracetic acid to be used as an ingredient in hydrogen peroxide formulations has never been put into regulation, although the NOP did accept the recommendation. That recommendation was designed to permit organic producers to continue to use hydrogen peroxide formulations that contained peracetic acid formerly permitted as an “inert” ingredient. We wonder whether enough time may have passed that this recommendation is now unnecessary.

We also urge the committee to consider the comments submitted by Richard Theuer, which would address some of our issues with peracetic acid. In particular, Dr. Theuer suggests using much lower concentrations, which might mitigate the risks to plants, people, and soil organisms. It is unfortunate that the committee is relying on a TAP review performed in 2000, since more recent information could clarify issues around the use of peracetic acid.

Because the use of peracetic acid for fireblight control does not meet the requirements of OFPA —and, in particular, does not fit any of the allowed categories of synthetic inputs— we urge you to prohibit that use.

Sincerely,



Terry Shistar, Ph. D.
Board of Directors