



BEYOND PESTICIDES

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September 10, 2012

National Organic Standards Board
Fall 2012 Meeting
Providence, RI

Re. PGML (Propylene Glycol Monolaurate) (Crops)

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 Subcommittee to deny the petition to list PGML (Propylene Glycol Monolaurate) because it fails to meet any of the criteria for listing on the National List —it has negative impacts on the agroecosystem, it is not essential, and it is incompatible with organic production.

1. PGML has negative impacts on the agroecosystem.

As noted in the subcommittee's checklist and the TR, PGML has broad-spectrum impacts. Predaceous mites, mites in the soil food web, and beneficial fungi may all be affected by its use. The petition states its impacts even more broadly, as "a broad spectrum antimicrobial agent to control fungi and bacteria that cause decay of post-harvest fruit and vegetables." It may also increase the toxicity of other biocides.

Cradle-to-grave impacts must also be considered, and PGML's manufacture is fossil-fuel dependent, requiring petroleum for both raw materials and fuel.

2. PGML is not essential.

Tetranychid mites, also known as spider mites, are well known secondary pests —pests that become damaging as the result of application of nonselective pesticides that kill both predators and "pests." The application of yet another nonselective pesticide such as PGML can only be counterproductive, especially in organic systems. Nonselective pesticides reduce populations of both predator and prey, but while the prey (pest) still has plenty of food (the crop), the predator's food source (the pest) is drastically reduced. Therefore, the pest population increases much faster after the application of the nonselective pesticide, proving in the long run

to be ineffective. As noted in the checklist, there are cultural practices that are much more effective at controlling spider mites.

3. PGML is incompatible with organic production.

PGML does not fit into any of the categories of §6517(c)(1)(B)(i) of the *Organic Foods Production Act* list of allowed synthetics in organic production. Broad spectrum pesticides, which create pest problems, are also inconsistent with organic production.

Therefore, we agree with the conclusion of the Crops Subcommittee that PGML does not meet any of the criteria for listing on the National List.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, written in a professional style.

Terry Shistar, Ph.D.
Board of Directors