



BEYOND PESTICIDES

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September 20, 2013

National Organic Standards Board
Fall 2013 Meeting
Louisville, KY

Re. HS: Ammonium Hydroxide

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.

Beyond Pesticides supports the Handling Subcommittee recommendation to deny the petition for use of ammonium hydroxide as a boiler additive to prevent corrosion. We agree with the Handling Subcommittee that ammonium hydroxide meets none of the OFPA criteria of human and environmental health impacts, essentiality, and compatibility with organic production.

Ammonium hydroxide is a serious irritant, toxic by all routes of exposure, known to pollute air and water, contributes to the greenhouse effect, and is toxic to fish and other aquatic species. It is not essential because there are other boiler additives on the National List that can be used for the same purpose, and there are practices that can be used in place of boiler additives. As an unnecessary hazardous substance, it is not consistent with organic production practices.

Therefore, we urge the Board to deny the petition for ammonium hydroxide. Furthermore, the new NOP sunset process will make it much more difficult to remove this material or annotate it in the future if the board thinks it necessary. Because we believe the NOP process violates the statute, and will therefore not subject ammonium hydroxide to the required assessment to determine re-listing at sunset in the future, we sincerely urge NOSB members to oppose this petition and any others where removal or annotation might conceivably be needed for health, environmental, and essentiality issues until we reinstate the sunset process of OFPA.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors