



BEYOND PESTICIDES

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March 1, 2013

National Organic Standards Board
Spring 2013 Meeting
Portland, OR

Re. HS: Barley Beta Fiber

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 disagrees with the Handling Subcommittee vote to list barley beta fiber on §205.606. The listing of nonorganic barley beta fiber does not meet any of the OFPA criteria for listing. Its production results in environmental contamination, it is inconsistent with principles of organic production and handling, and it is not necessary.

1. The production of barley by chemically-intensive methods leads to environmental degradation.

In considering whether to list a nonorganic agricultural substance on §205.606, a primary consideration should be the impacts of its production. As noted in the Technical Review (TR), lines 324-326, “Conventional farming relies heavily on monoculture and limited rotations, and uses fertilizers and pesticides that may be harmful to the environment and reduce ecological biodiversity.” Furthermore, with the anticipated release of transgenic barley high in β -glucan (TR lines 371-373), the control of the source of barley, to ensure that it is not genetically engineered, would be difficult. In addition, as noted in the TR lines 295-300, the barley is processed using ethanol, and ensuring that nonorganic ethanol is not made from genetically engineered corn is also difficult. Synthetic volatile solvents are not allowed in products labeled “organic” or “100% organic.” (§205.600(c)(2))

2. The use of non-organic barley beta fiber is inconsistent with principles of organic production and handling.

Barley beta fiber is not necessary. (See below.) “Organic production and handling systems strive to achieve agro-ecosystems that are ecologically, socially, and economically sustainable.”¹ Thus, it is inconsistent with organic principles to allow in organic food an unnecessary ingredient whose production causes environmental degradation.

¹ NOSB Principles of Organic Production and Handling, Adopted October 17, 2001

3. Barley beta fiber is not essential.

The TR lists a number of alternatives, including organic barley beta fiber. There is no reason to add the fiber other than the marketing reason of being able to use a “heart healthy” claim.

It is unnecessary to add dietary fiber if natural fiber is not removed. Thus, its use is contrary to §205.600(b)(4), “The substance's primary use is not as a preservative or to recreate or improve flavors, colors, textures, or nutritive value lost during processing, except where the replacement of nutrients is required by law.” As stated by the TR, lines 453-459,

Whole grains provide the nutritional benefits of β -glucan along with essential vitamins, minerals, complex carbohydrates and protein (Kantor, et al., 2001). The synergy of phytonutrients found in the whole grain package is difficult to replicate (Jones et al., 2002). High β -glucan waxy hull-less barleys can be used for many applications (Arndt, 2006). Whole-grain food intake by a large middle-aged, multiethnic cohort was correlated with reduced risk of physical characteristics linked to atherosclerotic cardiovascular disease in a way that was not attributable to individual risk intermediates, single nutrient constituents, or larger dietary patterns (Mellen, et al., 2007).

Therefore, we urge the Board to deny the petition to list barley beta fiber on §205.606.

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, with a long horizontal stroke at the end.

Terry Shistar, Ph.D.
Board of Directors