

GE contamination while not burdening organic growers, who are the victims of contamination of their seed stock. NOC encourages creative approaches that take into account that organic growers need seeds that are not contaminated by GE genes, are diverse and regionally-adapted to their growing conditions, and that costs to prevent contamination should be borne by the GE seed patent holders, who should be held accountable for the costs associated with their products.

POLICY DEVELOPMENT SUBCOMMITTEE

Public Communications

NOC has previously commented in detail in at least our last 2 comments to the Board (September and May 2012) that we fully support the direction of more communication with the Board. We specifically like the proposed *Policy for Public Communication between NOSB Meeting* voted by the Policy Development Subcommittee. NOC has recently been writing letters to the Board outside of Board biannual meetings and public comment periods directly through personal emails of those Board members who have agreed to receive this information. We think that a year-round public communication mechanism sponsored by the Board is preferable and more transparent. We appreciate this Recommendation.

Material Review Initiation Policy

We agree with the subcommittee that the initiation of materials review requires further discussion. Currently there are established policies for NOSB review of petitioned materials. However, there needs to be established procedures if a material comes to the NOSB by a process outside of the normal public petition process. NOC urges the NOSB to promote transparency and public participation in this process. In particular, technical reviews should be accessible to public so that they can provide comments of substance for the board.

CROPS SUBCOMMITTEE

OxyTetracycline – See separate submission by NOC for this petition

Polyoxin D Zinc Salt

NOC agrees with the subcommittee's recommendation to deny the petition to add Polyoxin D zinc salt to the National List. Polyoxin D is a broad spectrum fungicide, and as such is inherently incompatible with the basic principles of organic production. There are significant concerns about the capacity of this material to negatively affect non-target organisms, including beneficial fungi, insects, and aquatic species. Moreover, there are effective alternatives available control fungal pathogens--several currently allowed substances on the National List, crop rotation, crop nutrient management practices, sanitation to remove disease vectors, selection of resistant species and varieties (where applicable), beneficial antagonistic bacteria, and monitoring are listed in the TR as effective alternatives.

Indole-3-butyric Acid (IBA)

NOC supports the Crops Subcommittee recommendation to deny the petition to list IBA for the purpose of plant propagation via dipping. IBA is a plant hormone in the auxin family and is an ingredient in many commercial horticultural plant rooting products. This use of IBA does not meet the requirements of OFPA—it does not fit into a category of allowed synthetic inputs, and its health and environmental effects are not sufficiently known. In addition, there is no demonstrable need for IBA since successful rooting from stem cuttings is one of numerous plant propagation processes, and a number of synthetic and nonsynthetic substances can facilitate the process.

INERTS WORKING GROUP UPDATE

We thank the Inerts Working Group (IWG) and the Crops Subcommittee (CS) for creating a workable policy and procedure for subjecting so-called “inert” ingredients to the criteria of OFPA. NOC has noted several times in previous comments the importance of “inerts” review and the fact that ingredients of pesticide products that are labeled as “inert” are generally not physically, chemically, or toxicologically inert. But the use of the word “inert” has led policy makers and the public to discount the problems they might be cause. We urge the IWG and CS to begin the process of reviewing these substances as soon as possible. An important advantage of beginning this process now, is that if there are problems with the process, they are most likely to be revealed in practice, and can be dealt with prior to sunset deadlines.

HANDLING SUBCOMMITTEE

Sulfuric Acid

We agree with the subcommittee’s recommendation to deny the petition to add sulfuric acid to the National List for use in the production of seaweed extracts. The manufacture of the material creates numerous adverse effects on the environment, as sulfuric acid is a primary contributor to acid rain, and hence acidifying natural environments. The material also has the potential to contain heavy metal residues and impurities at levels above FDA tolerances. Additionally, sulfuric acid derived seaweed extracts such as fucoidan are not essential for organic production. Sulfuric acid is a synthetic substance whose use is neither compatible with organic principles nor necessary in organic production.

Barley Beta Fiber

NOC urges the NOSB to deny the petition since adding nonorganic barley beta fiber to organic food is not compatible with organic handling: the barley source will not be grown with any restrictions on synthetic fertilizer use or pesticide use; the processing of barley beta fiber involves conventional ethanol grown from GMO corn; alternatives are widely available; and finally, the barley beta fiber is not essential to production, particularly as the claimed health benefits are based on the nutritional value of the whole grain not just the fiber.