

# **DISCUSSION DOCUMENT:**

## **DEFINITION OF PRODUCTION AIDS**

### **DISCUSSION QUESTIONS**

#### **1. Is clarification of the term “production aids” needed?**

Yes, it is important to clarify the term “production aids.” This will save time, as the NOSB members will not need to spend time evaluating materials that clearly should not be used in organic production. Based on the current definition, production aids do not become part of the ecosystem and are never taken up by the plant.

The discussion document states: “NOP frequently identifies petitioned substances as production aids or possible production aids when assessing the eligibility of a substance prior to NOSB review.” For example, chlorine for aquaculture, and carbon dioxide for aquaculture, were classified as production aids by the NOP, but they clearly do not belong in that category. Apparently, it is not only necessary to clarify the definition of production aids, it is also necessary to request that the NOP adhere to that definition.

#### **2. Should clarification give further examples of what is and is not covered by the term? If so, please suggest inclusions and/or exclusions.**

Clarification of the term “production aids” should be provided for NOSB members. This would include the materials proposed for the category of production aids, and the reasons for their inclusion or exclusion from the category.

The Discussion Document lists several items that have been identified as production aids by the NOP, and other items that have been referred to as production aids. None of these substances fits the definition of production aids, for the reasons given below.

Ethylene gas, indole-3-butyric acid, oxidized lignite, and 6-benzyladenine are not production aids because they are taken up by plants.

Hydrated lime, ferric phosphate, and oxidized lignite are not production aids because they become part of the terrestrial ecosystem (soil or plants).

Carbon dioxide for aquaculture and chlorine for aquaculture are not production aids because they become part of the aquatic ecosystem.

### **3. What kinds of materials have historically been covered by the term “production aids”?**

The Discussion Document states that the only material listed as a production aid is microcrystalline cheesewax for mushroom production on logs. This material is correctly considered a production aid. Our response to question 2 is also relevant here.

### **4. Should clarification give a narrative definition, such as “materials used in production but not having direct impact on plants, soil, or the ecosystem”? If so, please suggest language.**

In general, we agree with the definition proposed by Beyond Pesticides. We added some clarifying language, and present the full definition here:

- Production aids include:
  - Physical items used in production but not leaving any residues in the aquatic or terrestrial ecosystem.
  - Chemical substances used on equipment, but not used on crops or livestock.
- Production aids do not include:
  - Any substance taken up by plants.
  - Chemical substances dispersed into soil, water, air, or plant surfaces.