



# BEYOND PESTICIDES

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March 11, 2013

National Organic Standards Board  
Spring 2013 Meeting  
Portland, OR

## **Re. HS: Sugar beet 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 sugar beet fiber on §205.606. The listing of nonorganic sugar beet 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 sugar beets 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 318-324, “Conventional sugar beet production relies on chemical fertilizers, herbicides, insecticides, and fungicides.” In Sweden, where the petitioner obtains its sugar beets, sugar beet seed is commonly treated with imidacloprid, which poses a serious hazard for honey bees and other pollinators. Furthermore, the control of the source of sugar beets, to ensure that they are not genetically engineered, would be difficult. In addition, as noted in the TR lines 295-300, nonorganic sugar beet processing is responsible for high levels of water and air pollution, including pollutants that would not be found in organic sugar production.

### **2. The use of non-organic sugar beet fiber is inconsistent with principles of organic production and handling.**

Sugar beet fiber is not necessary. (See below.) “Organic production and handling systems strive to achieve agro-ecosystems that are ecologically, socially, and economically sustainable.”<sup>1</sup> Thus, it is inconsistent with organic principles to allow in organic food an unnecessary ingredient whose production causes environmental degradation. Sugar beet fiber could go back into the soil instead.

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<sup>1</sup> NOSB Principles of Organic Production and Handling, Adopted October 17, 2001

**3. Sugar beet fiber is not essential.**

The TR lists a number of alternatives, and it is unnecessary to add dietary fiber if natural fiber is not removed. Thus, it's 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."

Therefore, we urge the Board to deny the petition to list sugar beet 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 written in a cursive, flowing style with a long horizontal stroke at the end.

Terry Shistar, Ph.D.  
Board of Directors