



# BEYOND PESTICIDES

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September 18, 2023

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave. SW  
Room 2648-S, Mail Stop 0268  
Washington, DC 20250-0268

**Docket # AMS-NOP-23-0026**

## **Re. HS: Magnesium Carbonate and Magnesium Carbonate Hydroxide**

These comments to the National Organic Standards Board (NOSB) on its Fall 2023 agenda are submitted on behalf of 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, Beyond Pesticides 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 the world.

The Organic Foods Production Act requires that substances be listed on the National List “by specific use or application.” Some of the listings in §§605-606 do not meet this requirement. We request that when the NOSB considers these petitions for magnesium carbonate and magnesium carbonate hydroxide it does so with a listing that states the specific use(s) or application(s). If the petition justification is limited to use in drying chicory for production of instant extract, then the listing should be so annotated.

While our preliminary review of available information does not reveal hazards, we await the requested technical reviews before commenting on the need for magnesium carbonate and magnesium carbonate hydroxide for the proposed use(s) or application(s).

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.  
Board of Directors