



BEYOND PESTICIDES

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March 23, 2018

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

Re. HS: Reclassification and relisting of magnesium chloride

These comments to the National Organic Standards Board (NOSB) on its Spring 2018 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.

Beyond Pesticides supports the reclassification of allowed magnesium chloride as nonsynthetic, the listing of nonsynthetic magnesium chloride on §205.605(a), and the removal of the annotation “derived from seawater” because magnesium chloride is available in nonsynthetic form (not necessarily from seawater), so it should no longer be allowed as a synthetic and should be listed as an allowed nonsynthetic..

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors