



BEYOND PESTICIDES

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September 19, 2017

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. CS: Fatty alcohols

These comments to the National Organic Standards Board (NOSB) on its Fall 2017 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.

Fatty alcohols are petitioned as a synthetic growth regulator for sucker control on organic crops. They are currently registered only for use on tobacco. Beyond Pesticides opposes this petition because fatty alcohols pose health and environmental hazards, are not needed, and are inconsistent with organic production.

Fatty alcohols pose health and environmental risks.

Manufacture poses risks to aquatic organisms. Fatty alcohols are high production volume chemicals. They exceed capacity of wastewater treatment systems to remove them, and are thus found in effluents, where they are toxic to aquatic organisms.¹

Application is also hazardous to terrestrial and aquatic organisms. Fatty alcohols are applied as a spray. Most would be expected to volatilize and most (up to C11) be degraded quickly, but longer chains reaching water resist hydrolysis, where they may bioaccumulate and are toxic to aquatic organisms.² In the terrestrial environment, the technical review (TR) finds that there is a potential for sublethal effects on Lepidopteran insects: “[G]iven that aliphatic alcohols can be used as Lepidopteran sex inhibitors, there is a potential for sublethal (e.g.,

¹ TR lines 294-299; 320-324.

² TR lines 303-308; 318.-324

reproductive) effects on non-target Lepidopterans, such as butterflies.”³ The TR also says that fatty alcohols “may produce short term toxicity to many organisms.”⁴

Human health effects include severe and sometimes irreversible eye irritation and slight to moderate skin irritation. The reentry interval, based on Tox category 1 eye irritation, is 48 hours. Personal Protective Equipment is required. The mode of toxicological action is unknown.⁵

In terms of the impact on soil and the agroecosystem, the TR finds that the product may produce short-term toxicity to many organisms.⁶ In addition, in the 1960s, similar products were investigated for their ability to make soil water repellent.⁷

Fatty alcohols are not essential for organic production.

In response to the NOP question about labeled uses, the petitioner replied:

You are correct in noting that the products O-TAC PLANT CONTACT AGENT and N-TAC are labeled only for use on tobacco. Petitions for the other uses are pending with EPA and are not currently permitted by EPA; therefore, we have amended the petition to remove the following uses

- Sucker control on tomatoes
- Meristematic regrowth on vegetable grafts
- Desiccant/defoliant on cotton

As an addendum, we have included copies of the submission correspondence and subsequent EPA actions and communications on these pending uses (see tab 9) · Therefore, we are resubmitting our petition that has been revised per the following- note the changes are in blue:

“NOP Reference changed to 205.601 (k)(2) and Requested annotation changed to ‘For use ***as a sucker control on organic crops.***’”

This and other similar changes actually broaden the use beyond the original petition. The only use allowed by law, and the only use for which the petitioner submits data in support, is on tobacco. While tobacco is grown by organic producers, we hope that the NOSB would not view as essential a material whose only allowed use is in the production of a harmful substance that carries a Surgeon General’s warning of dire health consequences from use.

³ TR lines 327-330.

⁴ TR lines 348-350.

⁵ TR lines 394-409.

⁶ TR lines 348-350.

⁷ Kolp, D.G., Krause, F.P. and Lange, W., 1966. Effect of tallow alcohol added to soil on the tension, flow, and evaporation of soil water. *Water Resources Research*, 2(2), pp.213-222.

In addition, the TR identifies manual topping and suckering, in addition to these alternative materials: indoleacetic acid at 10,000 ppm applied in lanolin, mineral, 10% neem oil, 20% mohua oil, and 25% groundnut oil, applied to each plant after topping. Methyl caprate, which may be produced by fermentation, has been used effectively for topping and suckering.⁸

Fatty alcohols are not consistent with organic production.

As noted by the TR, growth regulators –and hence fatty alcohols–do not fall into any of the OFPA categories of §6517(c)(1)(b)(i). Furthermore, fatty alcohols are registered with the EPA only for tobacco sucker control.⁹ The use of a synthetic to produce organic tobacco is questionable from a sustainability perspective.

Conclusion

Please deny the petition for fatty acid alcohols because they pose health and environmental hazards, are not essential, and are inconsistent with organic production.

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors

⁸ TR lines 459-468.

⁹ TR lines 166-168.