



# BEYOND PESTICIDES

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April 10, 2016

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: Ash from Manure Burning

These comments to the National Organic Standards Board (NOSB) on its Spring 2016 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 petition to annotate ash from manure burning (§205.602, nonsynthetic substances prohibited for use in organic crop production) asks for the following annotation: “except where the combustion reaction does not involve the use of synthetic additives and is controlled to separate and preserve nutrients.” The CS voted 5-0 against approving the petition.

In its proposal to relist ash from manure burning during the 2017 sunset, the CS gave this background:

Ash from manure burning was placed on §205.602 based on its incompatibility with organic production: “Burning these materials is not an appropriate method to use to recycle organic wastes and would not be considered a proper method in a manuring program because burning removes the carbon from these wastes and thereby destroys the value of the materials for restoring soil organic content. Burning as a disposal method of these materials would therefore not be consistent with section 2114(b)(1) of the OFPA (7 U.S.C. 6513(b)(1)).” (Preamble to proposed rule, December 16, 1997. 62 FR 241: 65874)

Burning a material that is central to maintaining soil fertility and tilth in organic soils is not compatible with organic production systems. There is nothing in the petition that refutes the judgment that ash from manure –including that produced by the petitioner’s process—is not

compatible with organic production. Organic practices incorporate carbon in the soil. The petitioner's process, like open burning, destroys high-energy carbon molecules that are essential for feeding the soil microbiology. The petitioner does not consider carbon a "nutrient," and therefore devalues its presence in manure. While carbon may not be a plant "nutrient," its presence as food for microbes and as humus is essential to organic soils, and therefore, the organic production system.

We heartily agree with the CS statement, "Utilizing ash from manure burning in order to assist CAFOs in their reduction of environmental and human health contamination is not a compelling argument for consideration for addition to the National List."

Therefore, Beyond Pesticides supports the CS recommendation to deny the petition.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a prominent initial "T" and a long, sweeping underline.

Terry Shistar, Ph.D.  
Board of Directors