



BEYOND PESTICIDES

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October 11, 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: Calcium chloride

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

In reviewing this substance, the NOSB must apply the criteria in the Organic Foods Production Act (OFPA), that its use—

- (i) would not be harmful to human health or the environment;
- (ii) is necessary to the production or handling of the agricultural product because of the unavailability of wholly natural substitute products; and
- (iii) is consistent with organic farming and handling.¹

Calcium chloride is listed as a prohibited natural, with an exception:

205.602(c) Calcium chloride, brine process is natural and prohibited for use except as a foliar spray to treat a physiological disorder associated with calcium uptake.

The TAP review was done in 2001. Summary (lines 14-17):

All the reviewers concluded that the material is inappropriate for soil application given the high chloride content and high solubility. Two of the three reviewers would prohibit all production uses except for foliar applications to correct nutritional deficiencies. All three reviewers agree that natural sources of food-grade calcium chloride should be

¹ OFPA §6517(c)(1)(A). Further details at OFPA §6518(m).

allowed as a postharvest dip. One would support adding synthetic food-grade sources to the National List for postharvest treatment.

TAP reviewer 2 (lines 423-425):

I don't see supporting evidence that this is entirely compatible. It appears that one of the reasons that Ca is deficient in the organs of certain fruits is that breeds of crops have been introduced to maximize fruit yield. If the deficiency is dependent on variety of fruit, would it behoove us to promote the use of varieties that do not exhibit the deficiencies?

Conclusion

Calcium chloride should remain on §205.602 as a prohibited natural material. The TAP review and previous NOSB recommendations all support limiting the use of calcium chloride to the restricted conditions when normal calcium uptake from the soil is impossible. The NOSB should request further investigation into the statement by the TAP reviewer that the deficiency can be avoided by choosing non-susceptible varieties.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry Shistar".

Terry Shistar, Ph.D.
Board of Directors