



BEYOND PESTICIDES

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September 15, 2021

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 ID # AMS-NOP-21-0038

Re. CS: Ammonia extracts

These comments to the National Organic Standards Board (NOSB) on its Fall 2021 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.

We thank the Crops Subcommittee (CS) for its thoughtful and thorough consideration of this petition and the comments (including ours) that have been submitted on it.

As stated in our previous comments, we support the prohibition of ammonia extracts. We support the approach of separate listings for stripped ammonia and concentrated ammonia, allowing for future listings if other technologies arise.

We also support adding to §205.203(f) a ceiling of 20% of crop needs on the use of nitrogen products with a C:N ratio of 3:1 or less as a precautionary measure. We do not want to delay NOSB action on this issue, but we believe that permitting nitrogen products with a C:N ratio of 3:1 of the 20% of crop needs in §205.203(f) should be allowed only in exceptional cases when organic fertility inputs of higher C:N ratio cannot be available to plants because of weather or soil conditions. This is consistent with OFPA §6513(b)(1), “An organic plan shall contain provisions designed to foster soil fertility, primarily through the management of the organic content of the soil through proper tillage, crop rotation, and manuring.” If an addition

to this effect cannot be made to the motion at the meeting, we ask that it be included as explanatory language in transmitting the recommendation.

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
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