



BEYOND PESTICIDES

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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: Ancillary Substances in Cellulose

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.

The Handling Subcommittee (HS) proposal on ancillary substances allowed in cellulose was referred back to the subcommittee. We see from the HS notes:

Cellulose/ancillary substances status. Based on a conversation with the NOP during the July 11 PDS call, the HS has chosen to not move forward at this time with the review of ancillary substances in cellulose. Until the NOP clarifies the process, the Subcommittees will continue to identify ancillaries as they are conducting sunset reviews and reviewing new petitions, for future reference. The work agenda item will be removed from the table above. A verbal update will be provided at the fall meeting. [8/1/2017]

Meanwhile, the Policy Development Subcommittee (PDS) is considering adding policy and procedures concerning ancillary substances to the Policy and Procedures Manual. It appears to us that the HS has found it impossible to follow the policy adopted by the board in reviewing ancillary substances in accordance with OFPA criteria. The solution apparently chosen by the HS –to identify ancillary substances without subjecting them to scrutiny according to the policy adopted by the board in 2013– only serves to raise questions about the integrity of the organic label. We are concerned that toxic materials, such as those identified in cellulose, continue to be added to organic products. It is important that the NOSB review all materials added to organic products and reject those that do not meet criteria specified in OFPA.

We repeat the comments we submitted in the Spring below as a reminder of the specific problems.

Beyond Pesticides opposes the proposal on ancillary substances allowed in cellulose. The HS has performed only a partial review of the proposed ancillary substances. In particular, it has not reviewed the substances it calls “polyvinylidene, vinyl chloride,” kymene, and “resin.” This lack of review is in itself a reason to reject this proposal. However, this proposal also demonstrates the danger in the policy articulated by the HS, “Any additional ancillaries that fall within one of the functional classes listed below do not need to be reviewed further in order to be used. Any new functional class of ancillaries however, would need to be petitioned in order to be allowed for use with cellulose.”

Polyvinylidenechloride

The first of these is also identified as CAS # 9002-85-1, which applies to polyvinylidenechloride (PVDC). Polyvinylidenechloride is a polymer of vinylidenechloride. The NOSB must clearly identify substances it allows to be added to organic food, and this material is not clearly identified.

If the listing refers to PVDC, then a review of the material should have revealed to the HS that it is a polymer of vinylidenechloride, also known as 1,1-Dichloroethylene (DCE). The IARC monograph on DCE states, “Vinylidene chloride copolymerizes readily with other vinyl monomers, such as acrylonitrile, alkyl acrylates and methacrylates, vinyl acetate and vinyl chloride. . . . The monomer is used in the USA almost exclusively as a comonomer, primarily with vinyl chloride.”¹ Therefore, it is possible that the listing is correct in including vinyl chloride. DCE has been detected in polymers.² Vinyl chloride has also been detected in polymers.

Thus, the proposed listing would allow both DCE and vinyl chloride to be added to organic food. If the HS had reviewed this material, it would have found that DCE is classified as a group 3 carcinogen and vinyl chloride a group 1 (carcinogenic to humans, the highest classification) carcinogen by the International Agency for Research on Cancer (IARC) of the World Health Organization. Vinylidene chloride-vinyl chloride copolymers, which is what this material appears to be, are listed as a group 3 carcinogen.

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors

¹ International Agency for Research on Cancer, 1986. Volume 39, Some Chemicals Used in Plastics and Elastomers.

² International Agency for Research on Cancer, 1986. Volume 39, Some Chemicals Used in Plastics and Elastomers.