



BEYOND PESTICIDES

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October 12, 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. HS Marine Algae Discussion Document

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.

We thank the Handling Subcommittee for tackling broad issues concerning the use of marine algae in organic production. The issues in this discussion document cannot be adequately addressed in the review of individual materials. Below, we respond to the subcommittee's questions and also raise an issue that was not addressed in the discussion document.

1. Should the naming conventions of the marine plant/algae listings on the National List be consolidated and/or clarified to avoid redundancies and duplication, using Latin binomials?

OFPA requires that each material be itemized by specific use or application. Marine algae listings should be clarified by adding Latin binomials. However, the listings should continue to be listed by specific use or application. Common names –e.g., “carrageenan” or “kelp”– frequently refer to several different species. The NOSB may find it necessary for reasons such as conservation or the avoidance of contamination to restrict the use in organic production to a subset of the full range of species thus identified.

2. Should annotations be written to clarify specific uses, or harvesting guidelines for any of the marine algae listings, such as “no machine harvesting of *Ascophyllum*,” and “Not harvested from a conservation area identified by State, Federal or International bodies”?

As noted above, annotations should always clarify specific uses. As indicated in the discussion document, some species included under a common name may be threatened or be part of a threatened community. In those cases, it is appropriate to exclude the threatened species or population with an annotation. The discussion document also mentions the fact that algae accumulate toxins –including heavy metals and radiation. It is therefore necessary that some listings would require algae taken from specific locations (or not taken from others.)

An alternative would be the elimination of all listings for marine algae, and require that carrageenan, agar, alginic acid, alginates, and beta carotene be made from algae that are certified organic. The requirements for wildcrafted or cultivated organic seaweeds would then include conservation and toxics avoidance.

3. Is there a need for further NOP Guidance on marine plants/algae?

Given the level of complexity at which this discussion document only hints, it will not be possible to include everything in the National List. There is still work to be done by the NOSB, but some of it should be incorporated into NOP guidance and some into regulations.

4. Problems with cultivation

Another issue that has not been addressed in this discussion document is the problem of introduced pests of native species through cultivation. In our comments on carrageenan, for example, we point out that in addition to the problem of overharvesting of *Chondrus* (cold water species), the cultivation of *Kappaphycus* in warm water helps to spread ice-ice disease of seaweeds.

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors