



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

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: Phosphates 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 this very helpful discussion document regarding phosphates used in organic foods. As the document notes, it is sometimes difficult to get a complete picture from reviews of individual materials.

Given the picture that arises from this discussion document –the potential of harm from cumulative exposure to phosphates added to food– it makes sense to focus on the essentiality of the various phosphates. Thus, we respond to the HS questions:

1. If some brands of organic processed dairy products can be produced without use of phosphates, why not all of them? What are the alternatives?

The first question is obviously rhetorical. If some brands of organic processed dairy products can be produced without use of phosphates, then others can. If organic processors are making products without phosphates, they are clearly using something else on the National List or nothing.

2. If European, Japanese, CODEX and IFOAM standards limit phosphates to only monocalcium phosphate – only as a leavening agent, why are all the other phosphates necessary in U.S organic food processing?

Again, this is clearly a rhetorical question. There should be no need for other phosphates in U.S. organic food processing.

3. Should phosphate food additives in processed organic foods be phased out, and if so should just some of them be phased out or should it be allowed in only some products?

Since it can be concluded that phosphates other than monocalcium phosphate as a leavening agent are unnecessary, they should be phased out. Presumably, this would greatly reduce the phosphate exposure to organic consumers. Alternatives to monocalcium phosphate can also be explored, but the action of removing other phosphates would reduce the likelihood of problems arising from use of monocalcium phosphate as a leavening agent.

This action would be separate from any consideration of phosphates as nutritional additives.

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 long horizontal stroke at the end.

Terry Shistar, Ph.D.
Board of Directors