



BEYOND PESTICIDES

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September 17, 2019

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-19-0038

Re. MS: Priority research issues

These comments to the National Organic Standards Board (NOSB) on its Fall 2019 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 general, Beyond Pesticides supports the MS list of research priorities. We do not support research on celery powder. See additional comments below.

Celery powder should not be used to add nitrates to organic food.

Our opposition to celery powder on §205.606 is based not only on the hazards associated with nonorganic production of celery, but also on the hazards of nitrites in food. Cultured celery powder is a way of adding "natural" nitrites. The quotation marks are appropriate since it is not possible to achieve the high levels of nitrate needed through organic celery production, though this research priority would seek to find a way to increase those nitrate levels.

Given the known health effects of nitrates, we have not seen a good reason for keeping celery powder on the National List. The Agency for Toxic Substances Disease Registry (ATSDR) of the Centers for Disease Control and Prevention (CDC) lists, for example, methemoglobinemia, hypotension, risk of pregnancy complications, a number of reproductive effects, and cancer, among others. Regarding cancer, ATSDR says:

Some study results have raised concern about the cancer-causing potential of nitrates and nitrites used as preservatives and color-enhancing agents in meats [Norat et al. 2005; Tricker and Preussmann 1991]. Nitrates can react with amino acids to form

nitrosamines, which have been reported to cause cancer in animals [Bruning-Fann and Kaneene 1993]. Elevated risk of non-Hodgkin's lymphoma [Ward et al. 1996] and cancers of the esophagus, nasopharynx, bladder, colon, prostate and thyroid have been reported [Cantor 1997; Eichholzer and Gutzwiller 1998; Barrett et al. 1998; Ward et al. 2010].

An increased incidence of stomach cancer was observed in one group of workers with occupational exposures to nitrate fertilizer; however, the weight of evidence for gastric cancer causation is mixed [Van Loon et al. 1998; Xu et al. 1992]. Epidemiological investigations and human toxicological studies have not shown an unequivocal relationship between nitrate intake and the risk of cancer [Alexander et al. 2010; Mensinga et al. 2003].

The International Agency for Research on Cancer (IARC) classifies nitrates and nitrites as "probably carcinogenic to humans" (Group 2A) under certain conditions (i.e. ingested nitrate or nitrite under conditions that result in endogenous nitrosation) which could lead to the formation of known carcinogens such as N-nitroso compounds [IARC 2010].¹

Finally, recent work demonstrates serious hormonal impacts of nitrate exposure.²

OFPA §6510(a)(2)-(3) makes it illegal to:

- (2) add any ingredient known to contain levels of nitrates, heavy metals, or toxic residues in excess of those permitted by the applicable organic certification program;
- (3) add any sulfites, except in the production of wine, nitrates, or nitrites;

The regulations at §205.301(f)(5) state that organic products must not "Contain sulfites, nitrates, or nitrites added during the production or handling process, Except, that, wine containing added sulfites may be labeled "made with organic grapes."

Celery powder is used in such a way that it adds significant nitrite, in light of the following.

Celery powder prepared from celery juice has been shown to have a nitrate content of approximately 2.75%. When using juice powder added at 0.2%, 0.35%, or 0.4% (on a total formulation basis), and assuming 100% nitrate-to-nitrite conversion, ingoing nitrite concentrations of approximately 69, 120, and 139 ppm (based on meat block), respectively, could be expected. As the amount of celery juice powder in the formulation increases, higher amounts of generated nitrite can be expected. . . From these results it was determined an uncured product with nitrite replaced with a source

¹ <http://www.atsdr.cdc.gov/csem/csem.asp?csem=28&po=10>.

² Guillette, L. J., & Edwards, T. M. (2005). Is nitrate an ecologically relevant endocrine disruptor in vertebrates?. *Integrative and Comparative Biology*, 45(1), 19-27.

Guillette, L. J. (2006). Endocrine disrupting contaminants-beyond the dogma. *Environmental Health Perspectives*, 114, 9.

containing naturally occurring nitrate could result in a product with higher levels of residual nitrite than one in which nitrite was originally and intentionally added.³

The concentrations above should be compared to the limit of 10 ppm in drinking water and the European Commission's (EC) Scientific Committee for Food (SCF) Acceptable Daily Intake (ADI) for the nitrate ion of 3.65 mg/kg body weight (equivalent to 219 mg/day for a 60 kg person).

Consumer Reports (CR) and Center for Science in the Public Interest (CSPI) have petitioned USDA to change labeling of meats in which nonsynthetic sources of nitrates and nitrites are used. The petition gives additional scientific information about how sources such as celery powder affect health and mislead the consumer. The petition presents research—as well as conclusions by expert bodies, including the World Health Organization, American Cancer Society, and American Heart Association—finding increased risk of colorectal cancer associated with the consumption of cured meats and recommending limiting consumption of them. Consumers of organic “uncured” meat that has been treated with celery powder are doubly deceived—they believe that organic products have no added nitrates, and they believe that celery powder is an innocuous additive. We refer the NOSB to the CSPI/CR petition for details.⁴

Thus, instead of seeking a way to grow celery organically with more nitrates, the NOSB should seek an alternative to nitrates/nitrites in processed meats.

Methionine in Poultry Production

Research into methionine alternatives in poultry production should include systems for raising black soldier fly larvae, now that they have been approved as poultry feed.⁵ Research on methionine should address the following:

1. How do methionine requirements vary with species and with breeds within species?
2. How much methionine is provided by pasture under optimum conditions?
3. Can poultry pasture be improved to provide more sources of methionine (e.g., more insects)?
4. Can natural sources of methionine be combined to provide methionine that is missing from pasture?
5. Are there particular conditions—e.g., seasons or temperature ranges—under which poultry pasture cannot be sufficiently improved and natural sources of methionine are inadequate to produce specific breeds/species?

³ [Ingredients in Meat Products: Properties, Functionality and Applications](#). pp. 398–399.

⁴ CSPI/CR Petition to Require Accurate and Non-Misleading Labeling on Meat Processed with Non-Synthetic Nitrates and Nitrites

https://cspinet.org/sites/default/files/attachment/2019%20Petition%20No%20Nitrates%20Added%20CSPI%20CU_COMPLETE.pdf.

⁵ <https://www.morningagclips.com/black-soldier-fly-larvae-earns-fda-recommendation/>.

Biodegradable Biobased Bioplastic Mulch (BBBM)

In addition to research on BBBM itself, we are concerned that synthetic mulches are taking the place of natural mulches that build soil and help sequester carbon in the soil. Such synthetic mulches are not compatible with organic practices unless there is no practical alternative. Therefore, we request support for research that will help determine the most cost- and labor-effective methods of mulching that can be used in place of BBBM or plastic mulch. Such research should consider separately weed suppression and soil warming, for which alternatives may be different. Organic no-till practices should be considered to be within the scope of this research.

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, written in a professional style.

Terry Shistar, Ph.D.
Board of Directors