



# BEYOND PESTICIDES

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

September 17, 2018

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. CS: Sodium citrate

These comments to the National Organic Standards Board (NOSB) on its Fall 2018 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.

Sodium citrate is petitioned as an anticoagulant to aid in the processing of blood into blood meal for use in organic crop production. Beyond Pesticides does not support the petition because sodium citrate is not necessary for this use. Sodium citrate does not pose hazards to humans or the environment. Its use as an anticoagulant in making blood meal products for use as organic fertilizer is not incompatible with organic practices. However, as documented in the technical review,<sup>1</sup> blood may be processed without the use of an anticoagulant such as sodium citrate. Listing of sodium citrate as an allowed synthetic for this use is a convenience that would allow the use of blood meal that does not have documentation regarding its source.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.  
Board of Directors

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<sup>1</sup> Technical Review, December 18, 2017. Lines 351-371.