



BEYOND PESTICIDES

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In these comments, we will address these issues.

- Climate and organic.
- Ion exchange resins.
- Plastic, including plastic mulch.
- Phasing out §606 listings.

Organic and the Climate

- An important caveat in stating that organic is climate smart is that NOP and certifiers must hold organic producers to the letter and spirit of OFPA.
- Operations based on hydroponics or confined animal facilities, and those that replace native ecosystems with organic farms do not meet those requirements.
- Will USDA abandon its promotion of chemical-intensive agriculture supported by the biotech/chemical industry in favor of whole-hearted support for organic agriculture?

Do Not Allow Ion Exchange Resins Without Review and Disclosure

- **Ion exchange** results in chemical change. Therefore, organic foods, such as apple juice or sugar, that have been processed with ion exchange are synthetic. Such synthetic “foods” must be allowed only if the NOSB has reviewed them and placed them on the National List.
- Only resins and their associated recharge materials approved for this use should be allowed in organic food processing, and only when they and the treated ingredients are approved for listing on §205.605(b).
- Chemicals added during the ion exchange process must be listed on the label.

Plastic Mulch Should be Eliminated

- Awareness is growing about the impacts of plastic—and the microplastic particles resulting from its use—on human health and the environment.
- Plastics manufacture requires transportation of hazardous chemicals, such as those involved in the recent derailment in East Palestine, Ohio.
- Plastic mulch should not be relisted as allowable in organic production.
- Moreover, the NOSB should initiate action to eliminate all uses of plastic in organic processing and packaging.

Phase Out Nonorganic Ingredients on §606

- Ingredients on §606 are produced using chemical pesticides and fertilizers, with their attendant dangers to people, the environment, and the climate.
- Materials should not remain on §205.606 if they can be supplied organically.
- The NOSB should ask:
 - What are the barriers to providing an organic form of this ingredient?
 - Could the need be met if the organic form is required?

