



BEYOND PESTICIDES

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September 10, 2012

National Organic Standards Board
Fall 2012 Meeting
Providence, RI

Re. Sulfuric Acid (Crops)

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, 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 groups around the world.

We support the Crops Subcommittee proposal to deny the petition to list sulfur dioxide for the stabilization of anaerobically digested poultry manure because it poses environmental hazards, is not essential, and is not compatible with organic agriculture.

1. Sulfuric acid results in adverse environmental and health impacts.

According to the Technical Report (TR), "Facilities that manufacture sulfuric acid are among the primary sources of sulfuric acid releases to the environment (ATSDR 1998)." It is apparent from the TR that the same process is used for making sulfuric acid regardless of whether the sulfur dioxide comes from scrubbers or another source. Sulfuric acid, when released into the environment, results in acid rain, which results in widespread impacts on terrestrial and aquatic ecosystems. Sulfuric acid exposure can cause irritation of the eyes and skin and produce altered lung function. Asthmatics are particularly sensitive to the pulmonary irritation produced by exposure to sulfuric acid.

2. The use of sulfuric acid to stabilize anaerobically digested poultry manure is not essential.

Other materials, some of which are on the National List, could be used to stabilize anaerobically digested poultry manure. More importantly, however, the use of anaerobically digested manure is not essential. Aerobic composting can be used and has more beneficial effects because it also inoculates the soil with beneficial aerobic organisms.

3. The use of sulfuric acid to stabilize anaerobically digested poultry manure is not compatible with organic production.

As stated by the Crops Committee in its 2006 recommendation, "Sulfuric acid, when used in animal manure, is changed to sulfate, which is in this case a synthetically derived plant nutrient." The use of fertilizers containing synthetic ingredients is prohibited by the *Organic Foods Production Act* §6508(b)(1).

Therefore, we support the recommendation to deny the petition.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is written in a cursive style with a prominent initial "T" and a long, sweeping underline.

Terry Shistar
Board of Directors