April 2, 2015

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: 3-decen-2-one

These comments to the National Organic Standards Board (NOSB) on its Spring 2015 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.

3-decen-2-one fails the OFPA criteria for necessity and compatibility. In addition, its manufacture requires the use of hazardous raw materials.

3-decen-2-one is not necessary.
Proper harvest, handling, and storage are the most effective practices to prevent unwanted sprouting of potatoes. Some herbs and essential oils may be useful.

3-decen-2-one is incompatible with organic practices.
The material is a synthetic preservative. As a sprout inhibitor, it prevents the use of treated potatoes as seed potatoes.

Manufacture and use may pose hazards to workers.
The raw materials acetone and hepaldehyde are volatile, flammable, and toxic. 3-decen-2-one itself may be a skin and eye irritant.

Conclusion
Since 3-decen-2-one does not meet OFPA criteria and may pose risks to workers, we support the Crops Subcommittee proposal to deny the petition to list 3-decen-2-one.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.  
Board of Directors