



# BEYOND PESTICIDES

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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