



BEYOND PESTICIDES

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September 20, 2013

National Organic Standards Board
Fall 2013 Meeting
Louisville, KY

Re. LS: Acidified Sodium Chlorite

These comments are submitted on behalf of Beyond Pesticides. 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.

Beyond Pesticides supports the recommendation of the Livestock Subcommittee to deny the petition because of lack of essentiality, as noted by the subcommittee, but also because organic production should be moving away from dependency on products of chlorine chemistry.

Acidified Sodium Chlorite (ASC) was petitioned for use as a teat dip treatment in organic livestock production. The subcommittee identified other substances are available and currently in use for that purpose.

The fact that use of chlorine —as opposed to chloride— is so universally associated with the production of persistent toxic chemicals has led environmental groups such as Greenpeace to seek a ban on chlorine-based chemicals. We believe that organic production should, for the same reasons, avoid the use of chlorine as much as possible. The allowance of chlorine in the rule reflects the fact that many organic growers —like most of the rest of us— depend on water sources that have been treated with chlorine. We don't believe that organic producers should have to filter chlorine out of the water they use for irrigating, cleaning equipment, washing vegetables, or cleaning food-contact surfaces. But they should not be adding more chlorine. There are practices and products that make all uses of chlorine unnecessary.

Therefore, we urge the NOSB to reject the petition for acidified sodium chlorite. Furthermore, the new NOP process on sunset will make it much more difficult to remove this material or annotate it in the future if the board thinks it necessary. Because we believe the NOP process violates the statute, and will therefore not subject Acidified Sodium Chlorite (ASC) to the required assessment to determine re-listing at sunset in the future, we sincerely urge NOSB members to oppose this petition and any others where removal or annotation might

conceivably be needed for health, environmental, and essentiality issues until we reinstate the sunset process of OFPA.

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, Ph.D.
Board of Directors