



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

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. HS: Ammonium Hydroxide

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 groups around the world.

Beyond Pesticides supports the Handling Subcommittee recommendation to deny the petition for use of ammonium hydroxide as a boiler additive to prevent corrosion. We agree with the Handling Subcommittee that ammonium hydroxide meets none of the OFPA criteria of human and environmental health impacts, essentiality, and compatibility with organic production.

Ammonium hydroxide is a serious irritant, toxic by all routes of exposure, known to pollute air and water, contributes to the greenhouse effect, and is toxic to fish and other aquatic species. It is not essential because there are other boiler additives on the National List that can be used for the same purpose, and there are practices that can be used in place of boiler additives. As an unnecessary hazardous substance, it is not consistent with organic production practices.

Therefore we urge the Board to deny the petition for ammonium hydroxide.

If the Board decides to approve ammonium hydroxide, it is important to annotate the listing with an expiration date. The subcommittee's review of the data raised issues leading it to recommend denying the petition. If the Board nevertheless approves the petition, those issues will remain, and hopefully be addressed by more information in the five years before the sunset date. Future new information concerning relisting of the material must be considered under the same terms as the original petition. Since the new NOP process requires a two-thirds majority to prevent a material from being relisted after five years—as opposed to the former policy of requiring a two-thirds majority to relist—the only way to apply the same threshold for allowance as is required by the petition process is through the Board adoption of a five-year expiration date as an annotation to the listing.

We sincerely urge NOSB members to oppose this petition.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a long horizontal stroke at the end.

Terry Shistar, Ph.D.
Board of Directors