



BEYOND PESTICIDES

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March 28, 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: Calcium sulfate

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.

Calcium sulfate fails the OFPA criteria for necessity and compatibility. In addition, testing would be required to determine whether a particular batch of gypsum contains toxic contaminants.

Synthetic calcium sulfate is not necessary.

According to the Crops Subcommittee checklist, there is abundant nonsynthetic gypsum available, as well as other sources of calcium and sulfur.

Synthetic calcium sulfate is incompatible with organic practices.

As the Crops Subcommittee points out, organic farming regulations and philosophy favor using non-synthetic substances over synthetic when available. Since ample non-synthetic gypsum is available, and price and convenience are not among the evaluation criteria, this use of synthetic gypsum does not appear to be compatible.

Synthetic gypsum may be contaminated with heavy metals.

The Crops Subcommittee cites a study by the Electric Power Research Institute that lists 29 contaminants, mostly heavy metals, which may be found in flue gas desulfurization gypsum. EPA recommends that a chemical analysis be done to support a decision to use the synthetic gypsum. This would put a burden on certifiers, materials review organizations, and growers to ensure that the gypsum will not contaminate the soil.

Conclusion

Since synthetic calcium sulfate does not meet the criteria of the Organic Foods Production Act (OFPA) and poses a risk to organic soils, we support the Crops Subcommittee proposal to deny the petition to list synthetic calcium sulfate.

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