



BEYOND PESTICIDES

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March 27, 2014

National Organic Standards Board
Spring 2014 Meeting
San Antonio, TX

Re. HS: Sunset for Tragacanth Gum

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 opposes the relisting of tragacanth gum on §205.606. There are potential health effects that have not been taken into account. Furthermore, under the new sunset policy announced by the NOP, unless the Handling Subcommittee (HS) proposes not to relist tragacanth gum, it will not be reviewed and considered by the full board as required by OFPA.

According to the Agricultural Market Service's (AMS) September 16, 2013 Federal Register notice, this NOSB meeting may be the last chance for public input on substantive matters affecting board and public consideration of sunset recommendations that will be voted on at a subsequent (presumably the next) NOSB meeting. Since AMS has cited new substantive information brought to a sunset voting meeting as "untimely," it is critical that technical reviews (TRs) and checklists are published to facilitate public comment at the meeting prior to a voting meeting. In the case of tragacanth gum, there has never been a TR or technical advisory panel report requested by the subcommittee, and the checklist has not been completed.

The Center for Science in the Public Interest lists tragacanth gum as a food additive that certain people should avoid because it has caused occasional severe allergic reactions. The HS has not previously investigated the impacts of nonorganic production of tragacanth gum on consumers, workers, or the environment.

Finally, the NOP announcement concerning sunset allows for only one kind of recommendation to come out of the subcommittee for consideration of the full board as a motion – a recommendation against relisting the sunset substance. Even if the subcommittee believes that tragacanth gum should be relisted, we believe that it is important for the full board to have the opportunity to consider a motion to delist sunset materials. To enable this, the HS must propose that tragacanth gum not be relisted.

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 flourish at the end.

Terry Shistar, Ph.D.
Board of Directors