



# BEYOND PESTICIDES

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March 11, 2013

National Organic Standards Board  
Spring 2013 Meeting  
Portland, OR

## Re. MS: Production Aids Discussion Document

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.

We are happy to see that the NOSB is addressing the meaning of the term “production aids.” As noted in the discussion document, the history of the Board shows a lot of confusion over the term. We believe that its meaning has often been stretched far beyond the intention of the authors of the Organic Foods Production Act (OFPA). §6517(c)(1)(B)(i) is designed to describe a limited universe of synthetic materials that might be used in organic production. It does not list “pesticides,” “growth regulators,” “solvents,” or others suggested by the Board in 2005 as appropriate for inclusion under the term “production aids.” We believe that the term should be strictly limited to things that are similar to the examples given in OFPA.

In response to the questions posed by the Materials Subcommittee:

### **1. Is clarification of the term “production aids” needed?**

As stated above, the term needs to be clarified to ensure that the intended limits on types of materials allowed in organic production are observed by the NOSB and NOP.

### **2. Should clarification give further examples of what is and is not covered by the term? If so, please suggest inclusions and/or exclusions.**

The list in OFPA, “netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers,” provides a clear idea that the term is meant to cover (1) physical items with minimal direct interaction—particularly, minimal chemical and biological interaction—with crops and livestock, and (2) chemical substances that are used on equipment, but not directly on crops or livestock. It may be helpful to give examples of things not covered by the term. These might include pesticides, growth regulators, fertilizers, soil amendments, and their ingredients.

**3. What kinds of materials have historically been covered by the term “production aids”?**

The discussion document gives a good description of the mixed use of the term “production aids.” It is telling that only one item on the National List is actually identified as a production aid. Microcrystalline cheesewax as used in log-grown mushroom production is just the kind of material that has limited direct chemical or biological interaction with the crop—providing a physical seal over the inoculation site. In spite of the confusion, the Board has not put the classification as “production aid” into the actual listing for substances like growth regulators or soil amendments that are clearly inappropriate.

**4. Should clarification give a narrative definition, such as “materials used in production but not having direct impact on plants, soil, or the ecosystem”? If so, please suggest language.**

We suggest language like the following. “Production aids include: (1) physical items with minimal direct interaction—particularly, minimal chemical and biological interaction—with crops and livestock, and (2) chemical substances that are used on equipment, but not directly on crops or livestock.”

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 member