



# BEYOND PESTICIDES

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November 4, 2011

National Organic Standards Board  
Fall 2011 Meeting  
Savannah, GA

## Re. Comments on Ozone Sunset

Dear Board Members:

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 support the recommendation of the Crops Committee to approve the continued use of ozone in organic production.** As we will explain below, this use meets the requirements of the Organic Food Production Act —its environmental effects are minimal when produced on site and injected into the irrigation system, it is better than available alternatives, and it is consistent with a system of organic and sustainable agriculture.

**1. The impacts of ozone on the human health and environment are minimal when it is generated on site and injected into irrigation systems for cleaning.**

Ozone is a powerful oxidizing agent and could have detrimental effects on humans, plants, and the soil if it was released or injected into the soil. However, the approved use involves injection into irrigation systems, and no the ozone should have reacted and become oxygen by the time it leaves the system.

**2. Ozone is an alternative to chlorine-based chemicals.**

Ozone does not produce hazardous by-products, unlike chlorine-based chemicals, which may produce carcinogenic trihalomethanes in reacting with organic matter. Chlorine and its by-products are damaging to soil organisms, but the use of ozone results only in the release of oxygenated water.

**3. The use of ozone is consistent with organic and sustainable agriculture.**

Use as an irrigation cleaner is an approved category of synthetic inputs into organic production. Otherwise, ozone appears to be fairly neutral with respect to the criteria for compatibility with organic and sustainable agriculture.

Because the use of ozone in irrigation systems meets the requirements of the Organic Food Production Act, we support its extended use.

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