

My name is Terry Shistar. I am on the Board of Directors of Beyond Pesticides. We have submitted comments on all the issues before the board. I will highlight a few of them.

Microplastics should not be broadcast into organic crops. Pear ester is a chemical kairomone synthesized to be structurally and functionally identical to a volatile substance emitted by mature and ripening pears and other fruits. It attracts codling moths and is used in various ways to control them. Pear ester should be added to the National List with an annotation that describes its use—as required by OFPA—and prohibits its use microencapsulated in plastic: “use of pear ester is limited to passive traps and monitors and not for use in microencapsulated formulations.” In addition, we are concerned that semiochemicals other than pheromones may have uses that are consistent with organic practices and may reduce the use of more hazardous materials, so we urge the NOSB to determine whether such uses exist and whether they would be permitted by OFPA.

Chitosan is a material in search of a place in organic production. It is a synthetic material that is not well characterized—and different forms have radically different uses and properties. It is not necessary for organic production, and the NOSB has a Technical Review that summarizes many allowed substances for the petitioned use in wine made with organic grapes.

Limits should be placed on the use of chlorine in livestock drinking water. Chlorinated drinking water is unavoidable for anyone using public water supplies, but many livestock producers supply drinking water from wells, cisterns, or ponds. The NOSB should propose guidance and/or instructions for certifiers regarding the application of this use in the various situations faced by livestock producers, including “shocking” wells with high concentrations of chlorine. The NOSB must perform a comprehensive review of cleaning, disinfecting, and sanitizing materials that can support annotations for these materials on the National List.

E-Commerce must provide all information about organic products that is required by law. Probably every organic consumer who has shopped online has encountered product names including the word “organic” or descriptions of products as “organic” or containing organic ingredients and wondered whether that description is true. There is inconsistency between the requirements when a product is offered for sale by a “brick and mortar” establishment and the requirements in eCommerce, and inconsistency provides an opportunity for fraud. The requirements for eCommerce should be brought into line with those for physical establishments. The NOSB must not wait for FDA to act, but immediately identify any obstacles to eliminating this loophole and propose a rule change that will address them.