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April 22, 2026

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.,
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Docket ID # AMS-NOP-25-0914

Re. HS: Sodium bicarbonate reclassification

These comments to the National Organic Standards Board (NOSB) on its Spring 2026 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 eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

Baking soda is the kind of material that was envisioned as populating the National List—a nontoxic material used in home kitchens as a leavening agent.

Beyond Pesticides appreciates the Handling Subcommittee (HS) clarifying that most forms of commercially available sodium bicarbonate should be classified as synthetic and there is a distinction between those synthetic forms.

We agree that the non-synthetic version obtained from nahcolite deposits should continue to be listed on §205.605(a). We have no information on whether there would be a commercial availability issue around nahcolite based sodium bicarbonate.

We agree with the classification of sodium bicarbonate from sodium carbonate—through both the Solvay and direct carbonation of trona ore—as synthetic because it has undergone synthetic chemical change.

We agree that it makes sense to continue to allow the synthetic version that is currently allowed—not only because of the reduced impact on organic handlers sourcing the material, but also because sodium bicarbonate produced by processing of trona ores has a smaller, though non-trivial, environmental and health impact than that produced by the Solvay

process.[1] Like all substances derived from mined materials, however, manufacturing results in substantial environmental impacts—of both natural and synthetic forms. Consistency with organic principles suggests that organic production and handling should aim to minimize reliance on mined materials.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors

[1] 2025 TR, Sodium Bicarbonate. Lines 955-1063.