



BEYOND PESTICIDES

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November 4, 2011

National Organic Standards Board
Fall 2011 Meeting
Savannah, GA

Re. Comments on Ammonium Nonanoate Petition

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 deny the petition for use of ammonium nonanoate in organic production. As we will explain below, this use does not meet the requirements of the Organic Food Production Act—its environmental effects are not sufficiently known, there are many alternatives available, and it is inconsistent with a system of organic and sustainable agriculture.

1. The impacts of ammonium nonanoate on the environment have not been adequately studied.

The Technical Review (TR) says, “No information could be found on the potential effects of ammonium nonanoate on soil organisms, soil temperature, water availability, pH levels, nutrient availability, salt concentration, solubility, or any other soil physicochemical and biological properties.” The lack of information about impact on soil organisms is an important deficiency. In addition, EPA’s evaluation lumps together all compounds categorized as potassium or ammonium salts of fatty acids, and does not provide data specifically about ammonium nonanoate, but says about the compounds (as cited by the committee),

Soap salts of fatty acids are considered to be slightly toxic to birds on an acute basis, practically nontoxic to birds on a dietary basis, slightly toxic to warm and cold water fish, and highly toxic to aquatic invertebrates (EPA, 1992). Toxicity data for nontarget insects are

not available for any soap salt (EPA, 2008). Some soap salts (e.g., potassium salts of fatty acids) are registered for use as insecticides (NPIRS, 2011). (TR lines 276-279)

Furthermore, the chemical has a broad spectrum, non-selective impact on plants. Since the impacts of ammonium nonanoate have not been adequately studied, we believe that the criteria for impacts on humans and the environment have not been satisfied.

2. There is no demonstrated need for ammonium nonanoate in organic agriculture.

As is pointed out in the TR (433-603), there is a wide range of materials that have been approved for weed control in organic agriculture. The TR also describes a wide range of weed control practices that are used in organic agriculture. (605-712) There is no need for another material.

3. The use of ammonium nonanoate is inconsistent with organic and sustainable agriculture.

As noted by the committee, its non-selective and broad spectrum action on green plants and broad spectrum insecticidal properties are not compatible with maintaining biodiversity, which is integral to sustainability and an organic system of agriculture.

Because the use of ammonium nonanoate does not meet the requirements of the Organic Food Production Act, we urge you to deny the petition.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry Shistar".

Terry Shistar, Ph. D.
Board of Directors