



BEYOND PESTICIDES

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November 9, 2011

National Organic Standards Board
Fall 2011 Meeting
Savannah, GA

Re. Comments on Sulfur Dioxide (Sulfites) in Wine

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 oppose the recommendation of the Handling Committee to approve the petition for use of the sulfites in wine labeled “organic.” As we will explain below, this use does not meet the requirements of the *Organic Food Production Act* —it has unnecessary adverse effects on the health of consumers, there is a very simple alternative, and it is inconsistent with a system of organic and sustainable agriculture.

1. There are severe health impacts for those sensitive or allergic to sulfites.

Sulfites are a known allergen and, therefore, they present a potential threat public health threat. As stated in the TR (456-461),

After eating foods or drinking wine preserved with sulfur dioxide or other sulfites, highly sensitive asthmatic individuals can develop bronchospasm. Sulfites appear to primarily affect asthmatics and children more than adults. It is estimated that approximately 10% of American adult asthmatics are sensitive to sulfites and only a small amount of the substance can trigger a reaction (Cleveland Clinic, 2010). Because of the health effects observed in sensitive populations, the FDA requires proper labeling on foods containing levels of sulfur dioxide that exceed 10 ppm (U.S. EPA, 2007a).

People rely on organic wines to be free of added sulfites.

2. There is no demonstrated need for sulfites in organic wine.

As is NOT pointed out in the TR, organic wine is currently made without added sulfites. The Handling Committee pointed to a 16-year-old Technical Advisory Panel report as evidence of the “essentiality” of sulfites, ignoring the testimony of wine makers who do make wine without sulfites. It is not even relevant that some wine makers find it necessary or desirable to use sulfites. *Necessity* is one of the criteria for allowing the use of a synthetic input, and sulfites have not been shown to be necessary. To the contrary, they have been shown to be unnecessary. Wine makers who choose to use sulfites may use the “made with organic grapes” label.

3. The use of sulfites in wine is inconsistent with organic and sustainable agriculture.

The use of sulfites in wine is incompatible with organic principles because it adds an unnecessary synthetic material, which is a preservative. It is contrary to consumer expectations of organic products to have synthetic preservatives, particularly those known to cause health problems, added to organic products.

Because the use of sulfites in wine meets none of 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