



BEYOND PESTICIDES

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September 20, 2013

National Organic Standards Board
Fall 2013 Meeting
Louisville, KY

Re. CS: Sunset of sodium carbonate peroxyhydrate

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.

Beyond Pesticides urges the Crops Subcommittee to oppose the relisting of sodium carbonate peroxyhydrate (SCP) as an algaecide. It has been found by the NOSB not to meet the OFPA criteria of essentiality, compatibility with organic production, and no impacts on human health and the environment. It was added to the National List as an alternative to copper sulfate in rice, but there is no evidence that it has been adopted or is effective for that use. Furthermore, under the new sunset process announced by the NOP, unless the Crops Subcommittee (CS) proposes not to relist SCP, it will not be reviewed and considered by the full board, as required by OFPA and basic standards of transparency.

The only available technical report (TR) for SCP is dated August 11, 2006. It does not mention a registration for rice. That use was registered after the TR was completed and before the November 2009 NOSB meeting at which SCP was approved. The CS had voted to deny the petition based on its failing in every category, but changed their recommendation based on the possibility of SCP replacing copper sulfate in rice. At that time, since the rice use was new, there was no history of its use and effectiveness. Thus, an important issue that needs to be addressed is whether SCP can be a replacement for copper sulfate. The comments that were posted regarding copper sulfate seem to suggest that it cannot.

Another issue that arose in NOSB discussions that was not adequately addressed in the TR was whether regular use of SCP might lead to a build-up of sodium in the soil. The TR does mention potential increase in soil pH. In particular, these issues were not addressed in the context of rice production. SCP is seen as a substitute for copper sulfate, which acts to acidify the soil, so substituting SCP could have long term effects on the pH. This is a question that must be addressed.

The TR mentions “low level” toxicity to birds and bees. However, the SCP label (GreenClean Pro) says:

ENVIRONMENTAL HAZARDS: This pesticide is toxic to birds. Do not contaminate water when disposing of equipment washwaters or rinsate. This product is highly toxic to bees and other beneficial insects exposed to direct contact on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. Do not apply this product or allow it to drift to crops where beneficials are part of an integrated pest management strategy.

There is no new technical review (TR) posted for this substance. We would like to be able to review a TR before submitting final comments. It does not appear that we will have a chance to submit comments to the docket that will be considered by the CS after a TR is posted, according to the new sunset process, so these comments are somewhat less detailed than we would like.

Finally, the NOP announcement concerning sunset allows for only one kind of recommendation to come out of the subcommittee –a recommendation against relisting the sunset substance. Even if the subcommittee believes that SCP should be relisted, it does not have the authority to act on behalf of the full board. If the CS does not recommend against relisting, the board would be acting without adequate transparency and public input. Therefore, the CS must propose that SCP not be relisted.

Thank you for your consideration of these comments.

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