



# BEYOND PESTICIDES

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September 20, 2013

National Organic Standards Board  
Fall 2013 Meeting  
Louisville, KY

## Re. HS: Glycerin

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 supports the Handling Subcommittee's proposal to remove synthetic glycerin from the National List §205.605(b), given that there are organic nonsynthetic forms of glycerin available. This is the kind of progress anticipated by the authors of the Organic Foods Production Act in designing a National List with mechanisms for reconsideration and removal.

Glycerin is also listed on §205.603 as a teat dip. Does it require a whole new petition to get the Handling Subcommittee to share its information with the Livestock Subcommittee? We hope that someone will petition to also remove glycerin from §205.603.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.  
Board of Directors