

Indole-3-butyric Acid (IBA)

NOC supports the Crops Subcommittee recommendation to deny the petition to list IBA for the purpose of plant propagation via dipping. IBA is a plant hormone in the auxin family and is an ingredient in many commercial horticultural plant rooting products. This use of IBA does not meet the requirements of OFPA—it does not fit into a category of allowed synthetic inputs, and its health and environmental effects are not sufficiently known. In addition, there is no demonstrable need for IBA since successful rooting from stem cuttings is one of numerous plant propagation processes, and a number of synthetic and nonsynthetic substances can facilitate the process.

INERTS WORKING GROUP UPDATE

We thank the Inerts Working Group (IWG) and the Crops Subcommittee (CS) for creating a workable policy and procedure for subjecting so-called “inert” ingredients to the criteria of OFPA. NOC has noted several times in previous comments the importance of “inerts” review and the fact that ingredients of pesticide products that are labeled as “inert” are generally not physically, chemically, or toxicologically inert. But the use of the word “inert” has led policy makers and the public to discount the problems they might be cause. We urge the IWG and CS to begin the process of reviewing these substances as soon as possible. An important advantage of beginning this process now, is that if there are problems with the process, they are most likely to be revealed in practice, and can be dealt with prior to sunset deadlines.

HANDLING SUBCOMMITTEE

Sulfuric Acid

We agree with the subcommittee’s recommendation to deny the petition to add sulfuric acid to the National List for use in the production of seaweed extracts. The manufacture of the material creates numerous adverse effects on the environment, as sulfuric acid is a primary contributor to acid rain, and hence acidifying natural environments. The material also has the potential to contain heavy metal residues and impurities at levels above FDA tolerances. Additionally, sulfuric acid derived seaweed extracts such as fucoidan are not essential for organic production. Sulfuric acid is a synthetic substance whose use is neither compatible with organic principles nor necessary in organic production.

Barley Beta Fiber

NOC urges the NOSB to deny the petition since adding nonorganic barley beta fiber to organic food is not compatible with organic handling: the barley source will not be grown with any restrictions on synthetic fertilizer use or pesticide use; the processing of barley beta fiber involves conventional ethanol grown from GMO corn; alternatives are widely available; and finally, the barley beta fiber is not essential to production, particularly as the claimed health benefits are based on the nutritional value of the whole grain not just the fiber.

Sugar Beet Fiber

We oppose the subcommittee's recommendation to add sugar beet fiber produced by chemical-intensive methods to the National List. Sugar beet fiber is petitioned for use as a dietary fiber in organic foods. Manufacturing sugar beet fiber from nonorganic sources creates adverse impacts on the environment during both the production and processing stage. Production of nonorganic sugar beets uses toxic pesticides that harm the environment.

Sugar beet processing produces high volumes of wastewater, and can cause air pollution and emissions problems. Although organic sugar beet fiber processing also has the potential to create these problems, conventional sugar beet processing may use certain chemicals that are not allowed in organic processing, including various antimicrobials not approved for organic processing.

Additionally, there is the possibility that genetically engineered sources of sugar beets will be used given that fact that 95% of sugar beets in the United States are genetically engineered to resist applications of the herbicide glyphosate. Although the petitioner is in Europe where there are no genetically engineered sugar beets in agricultural production, the petition does not restrict sugar beet fiber to European sources. Moreover, this product is not essential for organic production, as whole foods and other grains already on the National List represent reasonable, available alternatives.

NOC supports the more extensive comments of the Center for Food Safety and Beyond Pesticides on Sugar Beet Fiber.

DBDMH

We agree with the subcommittee that the petition for DBDMH, an antimicrobial wash in meat packing, should be denied. DBDMH is "extremely destructive to the tissue of the mucous membranes and upper respiratory tract" posing a threat to workers handling DBDMH. The material is not essential as there are numerous alternatives that are already approved for use in organics including hot water and lactic acid. In this instance it seems clear that the Precautionary Principle should be applied.

Auxiliary/"Other" Ingredients

NOC is concerned that the Handling Subcommittee proposal on "other ingredients" does not subject those ingredients to the criteria required by OFPA. The "baseline criteria" are not OFPA criteria. We propose that NOS B already has a policy for "other ingredients," and it is the same as the policy for all ingredients. All ingredients in food labeled "organic" must be organic or on the National List.

COMPLIANCE, ACCREDITATION AND CERTIFICATION SUBCOMMITTEE

Calculating Percentage of Organic Ingredients in Multi-Ingredient Products