



# BEYOND PESTICIDES

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National Organic Standards Board  
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Portland, OR

## Re. CS: Comments on Indole-3-butyric acid (IBA) Petition

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 Subcommittee to deny the petition for use of the growth regulator Indole-3-butyric acid (IBA) in organic production.** As we will explain below, this use meets none of the requirements of the Organic Food Production Act—it does not fit into a category of allowed synthetic inputs, its health and 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 use does not fit within any of the allowable uses of synthetic inputs into organic production.

7 U.S.C. § 6517 lays out requirements for the National List. Subsection (c)(1)(B)(i) lists the categories of active materials that may be allowed.<sup>1</sup> Synthetic growth regulators fall under none of these categories, as is indicated by the committee's responses to questions 7 a through e under "Category 3. Is the substance compatible with organic production practices?"

### 2. The impacts of IBA on human health and the environment have not been adequately studied.

Although EPA says there are no known human health risks ("with the exception of certain workers," the agency has waived most toxicological data requirements. (TR 221-224, 303-305, 312-313) EPA also waived most ecological effects data requirements. (2008 Petition, p. 174) We do not know about the impacts of manufacture because the process is cited by the petitioner as confidential business information. (TR 127-129)

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<sup>1</sup> (B) the substance -

(i) is used in production and contains an active synthetic ingredient in the following categories: copper and sulfur compounds; toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers;

IBA has a typical hormonal response in plants. Its effects depend on timing (TR 252-255), and increasing doses may reverse the effects (Petition, p. 81.) It has effects on plants at very low doses. Just as we are now wary of using chemicals with hormonal effects on animals, we should also avoid widespread use of synthetic plant hormones.

Since the impacts of IBA have not been adequately studied, and it is unclear what impact the use of IBA could have on nontarget plants, we believe that the criteria for impacts on humans and the environment have not been satisfied.

**3. There is no demonstrated need for IBA in organic agriculture.**

As is pointed out in the TR (476-477), propagation from cuttings is one of numerous plant propagation processes, and a number of synthetic and nonsynthetic substances can facilitate the process. "Successful rooting from stem cuttings depends on numerous factors such as stock plant management, timing, types of cuttings, rooting environment (light, temperature, moisture, etc), and ten other or so factors (Bir and Bilderback, 2011; Hamilton and Midcap, 2009; Ofori et al., 1996). Applying plant hormones is one of these factors....The application of plant hormones is not a method for all scenarios since this application is further limited by numerous factors: amount, timing, type-mismatch, solution or solid, etc." (TR 494-500) Furthermore, synthetic growth regulators fall under none of the categories of allowable inputs in organic agriculture, so a "need" would be inconsistent with OFPA.

**4. The use of IBA is inconsistent with organic and sustainable agriculture.**

Synthetic growth regulators fall under none of the categories of § 6517(c)(1)(B) of allowable synthetic inputs. In addition, European and North American regulations do not allow synthetic products to obtain organic propagation.

Because the use of IBA meets none of the requirements of the Organic Food Production Act, we urge you to deny the petition.

Sincerely,



Terry Shistar, Ph.D.  
Board of Directors