

### **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.