



BEYOND PESTICIDES

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October 11, 2016

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Re. CS: Potassium Cellulose Glycolate

These comments to the National Organic Standards Board (NOSB) on its Fall 2016 agenda are submitted on behalf of 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, Beyond Pesticides 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 the world.

In reviewing this substance, the NOSB must apply the criteria in the Organic Foods Production Act (OFPA), that its use—

- (i) would not be harmful to human health or the environment;
- (ii) is necessary to the production or handling of the agricultural product because of the unavailability of wholly natural substitute products; and
- (iii) is consistent with organic farming and handling.¹

Beyond Pesticides agrees with the Crops Subcommittee (CS) proposal to deny the petition to add potassium cellulose glycolate to the National List because it is unnecessary and incompatible with organic farming, as detailed in the proposal. In addition, we have further comments.

The petition provides a “label,” which appears to be a shipping label. It does not, for example, provide an ingredients statement or directions for use. For this reason, the petition should have been rejected as insufficient.

The petition fails to disclose confidential business information (CBI) relevant to consideration of

¹ OFPA §6517(c)(1)(A). Further details at OFPA §6518(m).

the petition.² NOP codified the NOSB decision not to accept CBI in NOP 3011, issued March 11, 2016. The petition was received June 22, 2016, and should have been rejected as insufficient because it claims CBI.

The justification in the petition says:

Explain why the synthetic substance is necessary for the production or handling of an organic product.

Water management is the capacity to move water wherever is needed in order to improve plant health. The water-like natural base polymer, potassium CMC, is able to hold water in two the root zone balancing the behavior of most of soil surfactants that move water into the soil. The potassium salt is preferred to the sodium salt as it provided better performance at the same concentration and is not increasing the sodium balance into the soil.

Yet, the petition is for an “inert” ingredient. If this is to be used as an “inert” ingredient, then its function in the pesticide formulation must be explained. This justification goes with an active soil amendment, not an “inert” ingredient as defined in FIFRA (and hence OFPA).

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors

² “Further details of Lamberti’s manufacturing process is considered to be Confidential Business Information (CBI).”