



BEYOND PESTICIDES

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September 17, 2018

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. HS: Tamarind seed gum

These comments to the National Organic Standards Board (NOSB) on its Fall 2018 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.

Beyond Pesticides opposes the listing of tamarind seed gum because it is not essential for organic processing and handling. The NOSB should consider the question of whether any of the gums are essential for organic handling and processing.

The petitioner states, "There are several operators in India selling organic certified tamarind pulp which would mean that during growth and harvesting the entire pod including the seeds were organic certified. However, the manner in which seeds are sold in India doesn't allow for organic traceability. Seeds are collected throughout India and sold in local markets. Roasters purchase the seeds and remove the kernel for sale. The kernel is sold for TKP manufacturing in India."¹ Since organically produced tamarind seed is available and the issue is organic traceability, the petitioner should be advised that listing on the National List takes time, and the petitioner would be wise to put energy into correcting the traceability problems, rather than pushing the material through the listing process.

It is time to stop adding listings to §606. Organic production is grown up now, and any agricultural commodity can be produced organically. Listing on §606 only stifles organic production of new organic crops and promotes chemical-intensive production. Finally, in the time that it takes to add new regulations, petitioners could develop the demand for the organic product.

¹ Petitioner's response to additional information request from NOSB.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is written in a cursive style with a long horizontal flourish at the end.

Terry Shistar, Ph.D.
Board of Directors