



# BEYOND PESTICIDES

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September 20, 2013

National Organic Standards Board  
Fall 2013 Meeting  
Louisville, KY

## Re. HS: Sunset for Tragacanth Gum

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.

Beyond Pesticides opposes the relisting of tragacanth gum on §205.606. There are potential health effects that have not been taken into account. Furthermore, under the new sunset policy announced by the NOP, unless the Handling Subcommittee (HS) proposes not to relist tragacanth gum, it will not be reviewed and considered by the full board as required by OFPA and basic standards of transparency.

The Center for Science in the Public Interest lists tragacanth gum as a food additive that certain people should avoid because it has caused occasional severe allergic reactions. The HS has not previously investigated the impacts of nonorganic production of tragacanth gum on consumers, workers, or the environment.

Finally, the NOP announcement concerning sunset allows for only one kind of recommendation to come out of the subcommittee –a recommendation against relisting the sunset substance. Even if the subcommittee believes that tragacanth gum should be relisted, it does not have the authority to act on behalf of the full board. If the subcommittee does not recommend against relisting tragacanth gum, it would be acting without adequate transparency and public input. Therefore, the Handling Subcommittee must propose that it not be relisted.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.

Board of Directors