



# BEYOND PESTICIDES

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September 18, 2024

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

**Docket ID # AMS-NOP-24-0023**

## **Re. HS: Potassium phosphate(s)**

These comments to the National Organic Standards Board (NOSB) on its Fall 2024 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 eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

We concur with the findings of the Handling Subcommittee:

1. FDA's designation of GRAS applies only to dipotassium phosphate, with no other potassium phosphate salts deemed GRAS.
2. As shown in Appendix A, many materials already on the National List are available for the uses mentioned in the petition.
3. The findings of the search of the peer reviewed literature targeted recent publications (see Appendix B for select list). The literature search revealed that the health concerns remain unchanged. The publications we identified mentioned: the likelihood that dietary exposure to phosphates is underestimated; the typical person is exposed to more than twice the recommended amount; and impacts on brain, cardiovascular, kidneys, bone health, and overall mortality. Thus, the bulk of the evidence still points to health concerns about dietary exposure to phosphate(s) in general.
4. The paper submitted by the petitioner – funded and managed by the petitioner – appears to be the lone paper we were able to locate that finds no significant

relationship between phosphorous intake and negative health outcomes (including the papers that cite this work).

5. The subcommittee finds that the body of research finding no health impacts is not sufficiently robust and is still outweighed by the vast amount of the research that finds negative health impacts of phosphorous. Thus, the health concerns raised in the 2016 NOSB Discussion Document remain relevant.

In addition, with regard to GRAS, we note that it is only a criterion to be considered, but not one that meets OFPA criteria and guarantees listing on the National List.

**Therefore, we agree that the petition to remove the limiting annotation and to expand the listing to all phosphates should be denied.**

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry Shistar".

Terry Shistar, Ph.D.  
Board of Directors