



BEYOND PESTICIDES

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April 1, 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

Docket ID # AMS-NOP-18-0071-0001

Re. CS: Calcium acetate petition

These comments to the National Organic Standards Board (NOSB) on its Spring 2019 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.

Calcium Acetate is Incompatible with Organic Practices

The proposed uses of calcium acetate are not compatible with organic practices. The petitioner proposes two uses:

1. A rapidly available form of calcium for plants, and
2. A means of reducing heat stress by application to plants or to black plastic mulch.

The first use is definitely incompatible with organic production, in which the grower feeds the soil organisms, which feed the plants. The petitioner's justification statement provides an explanation of the processes by which organic and non-organic agriculture differ in their use of plant nutrients. The petitioner justifies its product by saying that it does not behave the way inputs in organic agriculture are supposed to behave.

We do not believe that the application of a synthetic material in order to overcome the problems inherent in the use of another synthetic material—using calcium acetate to overcome overheating caused by black plastic mulch—is compatible with organic production. The need for a synthetic material to prevent sunscald should also be examined by the CS.

Calcium Acetate is Not Essential for Organic Production

As documented in the technical review (TR), there are nonsynthetic minerals high in calcium that can provide calcium for plants and for soil pH adjustment, including calcium carbonate-containing minerals such as limestone, dolomite, calcite, and ground oyster shells. As stated in the TR, these materials are “limited” due to their insoluble nature. This is, of course, a reason that such materials are used in organic production instead of more soluble substances like calcium acetate.

Regarding the sunscald protection, the TR points out, “Alternative practices for sunscald protection are careful pruning to avoid exposure of the harvestable material to direct sunlight (Piskolczi et al. 2004). Additionally, other means of preharvest protection from sunscald include the installation of an artificial shade or an overhead sprinkling canopy (Piskolczi et al. 2004, USDA 2017). Any other means of providing a physical sunblock protection such as the application of kaolin and other clay-based sprays may also provide alternatives for sunscald protection.”¹ In addition, “Calcium carbonate is included in the final formulation of the calcium acetate mixture and is primarily responsible for sunscald protection due to its low water solubility (Frizzel and Loosemore 2010, Piskolczi et al. 2004).”

Conclusion

Beyond Pesticides agrees with the Crops Subcommittee in opposing the listing of calcium acetate because it is incompatible with organic production practices and is not essential for organic production.

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors

¹ Calcium acetate technical review, 2018. Lines 488-492.