



# 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. CS: Calcium acetate discussion document

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.

As the Crops Subcommittee (CS) considers the petition for calcium acetate, it should pay particular attention to the question of whether the proposed uses of this material are 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.

We believe that 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.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.  
Board of Directors