



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

September 10, 2012

National Organic Standards Board
Fall 2012 Meeting
Providence, RI

Re. Oxidized lignite petition/Humic acid annotation (Crops)

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.

We support the recommendation of the Crops Subcommittee to consider the oxidized lignite petition in the context of the listing for humic acids. We agree with the subcommittee that humic acids derived from coal by oxidation with hydrogen peroxide should not be listed because of environmental and health impacts, lack of essentiality, and incompatibility with organic production. However, we think that the same reasoning could be applied to humic acids derived from coal by treatment with alkali.

1. Oxidized lignite has negative impacts on human health and the environment.

The NOSB must take into consideration cradle-to-grave impacts of materials under consideration for listing on the National List. Therefore, the negative impacts of coal mining are definitely pertinent to this proposal. Lignite is strip-mined, which causes widespread damage to the air, land, and water. In addition, exposure to people living in areas where lignite is mined, through dust or water pollution is relevant given the connection, noted in the Technical Review (TR), between lignite exposure and kidney failure and renal cancer.

2. Oxidized lignite is not essential for organic production.

Humic acids are produced by the decomposition of organic material. As noted in the TR, "Compost, cover crops, manure, mulch, and other natural sources of organic matter can all increase humic acid content of the soil."

3. Oxidized lignite is not compatible with organic production.

As mentioned in the TR, "Humic acid derivatives, including oxidized lignite, do not explicitly fall into any of the categories for production found in 7 USC 6517(c)(1)(B)(ii)." Therefore, they (including the alkali-derived humic acids) are not eligible for listing on the National List. In addition, it is profoundly contrary to organic principles to use a fossil-fuel-derived substance as

a substitute for such fundamental organic practices as the use of compost, cover crops, manure and organic mulch. Therefore, we support the proposal to deny the petition of oxidized lignite.

Thank you for your consideration of these comments.

Sincerely,

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

Terry Shistar, Ph.D.
Board of Directors