



BEYOND PESTICIDES

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March 11, 2013

National Organic Standards Board
Spring 2013 Meeting
Portland, OR

Re. HS: Sulfuric acid

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 supports the Handling Subcommittee's recommendation to deny the petition for listing sulfuric acid on §205.605(b). Sulfuric acid does not meet the OFPA criteria because it has adverse impact on human health and the environment, is not compatible with organic production, and is not necessary.

We are surprised that the subcommittee accepted the petition as sufficient, in view of the large sections of the petition redacted as CBI. It is, of course, difficult to say what the redacted text is, but part of it was the response to the question asking for chemical interactions with other substances, especially substances in organic production. Given that sulfuric acid is a common chemical with a great deal known about its chemical properties, we wonder how the petitioner can claim such information to be CBI.

1. Sulfuric acid contributes to acid rain and is a hazardous chemical in the workplace.

As stated in the Technical Report (TR), lines 47-51,

Sulfuric acid is one of the primary chemical agents of "acid rain" (ATSDR, 2004). Because it is not very volatile, sulfuric acid from sources of air pollution are often found in the air as microscopic liquid droplets or are attached to other small particles in the air (HSDB, 2010). Atmospheric deposition of sulfuric acid from air pollution can lower the pH of surface waters and other environmental media and has a corrosive effect on living and nonliving components of the aquatic and terrestrial environments (USDA, 2006).

And on lines 327-329, "ATSDR affirms that sulfuric acid manufacturing facilities are among the primary sources of sulfuric acid releases to the air (ATSDR, 1998)."

In addition, the TR documents the health hazards associated with sulfuric acid, including irritation and burns to eyes, nose, throat, and lungs; pulmonary edema; blindness; and death.

The petitioner says that sulfuric acid with a concentration of 50% is used in the extraction of fucoidan, so workers are exposed to a hazardous concentration.

2. The use of sulfuric acid is incompatible with organic production practices.

The NOSB Principles of Organic Production and Handling include the following:

1.4.5. Organic processors and handlers use practices that minimize environmental degradation and consumption of non-renewable resources. Efforts are made to reduce packaging; use recycled materials; use cultural and biological pest management strategies; and minimize solid, liquid, and airborne emissions.

1.5. Organic production and handling systems strive to achieve agro-ecosystems that are ecologically, socially, and economically sustainable.

Sulfuric acid does not meet these requirements because its production results in environmental degradation and air-borne emissions that degrade agroecosystems.

3. Sulfuric acid is not essential to organic production.

Since sulfuric acid is used by the petitioner to extract fucoidan from seaweed, its claim to essentiality depends on the necessity for fucoidan. Fucoidan is a sulfated polysaccharide that has been used as an ingredient in food supplements, function foods, beverages, and cosmetics. The petitioner has not established a need for fucoidan in organic production and handling.

Therefore, we urge the Board to deny the petition to list sulfuric acid on §205.605(b). We also urge the Board to be more careful in accepting petitions with CBI redacted.

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