

October 4, 2018

Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independent Ave., SW
Room 2648-S, Mail Stop 0268
Washington, D.C. 20250-0268

Re: Meeting of the National Organic Standards Board

Docket # AMS-NOP-18-0029-0001
Federal Register Number: 2018-16386

Dear National Organic Standards Board Members:

The following comments are submitted to you on behalf of The Cornucopia Institute, whose mission is, in part, to support economic justice for family-scale farming.

Cornucopia supports *Beyond Pesticides'* comments in their entirety.

We specifically **oppose** the listing of petitioned substances: silver dihydrogen citrate, allyl isothiocyanate, and natamycin.

- **Silver dihydrogen citrate** is an antimicrobial processing aid that should **not** be listed as an allowed substance. Even though the petitioner argues that bacteria are becoming resistant to current methods of microbial controls, this substance is nothing more than a Band-Aid for unsanitary production and handling practices so common in conventional livestock production. Not only are there alternative methods of controlling cleanliness, there are safety concerns. Both ionic silver and nanosilver are toxic not only to microbes, but to other species as well. This substance would have a harmful effect on the beneficial soil microbiome organic agriculture relies upon.
- **Allyl isothiocyanate** is a substance two petitioners propose adding as an allowed synthetic substance in organic crop production (§ 205.601) as a pre-plant fumigant. Cornucopia has concerns this material would cause serious impacts on biodiversity, particularly soil biodiversity that supports authentic organic production. The TR says: "AITC is also toxic to fungi that produce mutualistic relationships with plants and prey on pest insects. Therefore, non-target plants and beneficial microorganisms would be damaged in treatment plots due [to] AITC drift."¹ This material is in no way compatible with organic production.
- **Natamycin** is petitioned for use as a post-harvest treatment on various food commodities to control fungal diseases. Natamycin is described by the EPA as a nonsynthetic pesticide produced by fermentation of a naturally occurring

¹ TR lines 687-689.

microorganism. However, the fermentation process does not meet the stricter organic requirements required to find something “nonsynthetic” and allow its widespread use. Any widespread use of this substance in agriculture would promote microbial resistance, as this substance is used in medicine to treat a number of diseases. Cornucopia agrees with Beyond Pesticides’ conclusion that the NOSB should list natamycin in §§ 205.602 and 205.604 to prohibit its use in organic crop and livestock production.

In general, there should be a very high bar to list further materials and methods to 7 CFR §205.601, and the above substances do not meet that bar.

One of the prerequisites for adding materials to the National List is that they are compatible with the fundamental precepts of organic farming and food production. In our opinion these three petitioned materials are not.

In addition to these material proposals, Cornucopia supports the NOSB’s plan to pursue whole farm research into livestock issues including methionine, the prevention and management of parasites, and organic livestock breeding. Research into methionine use in poultry is particularly needed, as we have concerns that synthetic methionine is being used principally as a production tool rather than as a dietary supplement essential for animal welfare, particularly at current rates of administration. If accurate, that would not be compatible with organic agriculture.

Poultry get methionine from their diets, and poultry who are raised following the spirit and letter of organic law should be getting most, if not all, of their methionine from a varied diet supplemented by outdoor foraging.