



December 2, 2025

EPA Administrator Lee Zeldin
U.S. Environmental Protection Agency
Office of the Administrator
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: FACT CHECK: EPA Debunks False Claims that Agency Recently Approved "Forever Chemical"
Pesticides published Nov 26, 2025

Dear Administrator Zeldin,

The Organic Trade Association (OTA) appreciates EPA's recent fact-check and the Agency's clear affirmation that consumers retain the right to choose organic products. We applaud this acknowledgement of consumer choice. It reflects both consumer expectations and the reality of a strong and growing marketplace for certified organic food. As the trade association representing the full U.S. organic supply chain, we welcome any effort to combat misinformation and to support informed consumer choice.

With that in mind, we must respectfully point out the need for correction of several statements contained in Fact #5 of the press release which were presented as "full disclosure and total transparency" but fall short of both. Specifically:

1) The statement "organic farming relies on pesticides for crop protection" is both incorrect and incomplete.

Organic farming relies first on required ecological management practices, not pesticides. This is not a marketing claim; it is federal law under the Organic Foods Production Act (OFPA) and USDA's National Organic Program rules.

Under 7 CFR § 205.206, organic operations must prevent pests, weeds, and diseases primarily through:

- Crop rotation, soil health, and nutrient management
- Sanitation and cultural practices that remove pest habitat and strengthen plant resistance
- Mechanical, physical, and biological controls, such as beneficial insects, traps, grazing, mulching, and habitat for natural enemies
- Only after these practices are insufficient may an organic farmer apply a substance, and only if:
 - It is a nonsynthetic input, or
 - It is one of a small number of synthetic materials specifically allowed on the National List, and

- Its use is documented in the farm’s Organic System Plan and verified annually by a USDA-accredited certifier.

→ This statutory requirement is unique to organic agriculture. Describing organic systems as “relying on pesticides” misrepresents a legally mandated, prevention-first framework.

2) The statement “some organic-approved pesticides have higher toxicity profiles...” is a misleading comparison.

We agree with EPA that LD₅₀ values alone are not a meaningful measure of real-world safety. Yet the press release relies on comparisons that use LD₅₀ precisely that way. LD₅₀ reflects how much of a substance may cause acute lethality in a laboratory—not the long-term health or environmental risks that families, farmers, and communities actually care about.

By LD₅₀ alone:

- Chocolate (~300 mg/kg) appears “more toxic” than DDT (~800 mg/kg)
- PFOS falls roughly in the range of chocolate
- Glyphosate appears “safer” than table salt

These comparisons are scientifically irrelevant for evaluating chronic exposure, endocrine disruption, neurodevelopmental risks, bioaccumulation, water contamination, or persistence, which are precisely the concerns at issue with PFAS.

→ Using LD₅₀ to imply that organic-approved inputs are “more toxic” than modern synthetics obscures far more than it reveals.

3) EPA’s own role in reviewing organic inputs was omitted, and is incomplete as stated.

Every substance allowed in organic farming is already reviewed by EPA under the same federal pesticide registration and safety standards that apply to all crop protection tools.

Organic requirements go beyond this baseline. OFPA requires that EPA, HHS, and a 15-member Congressionally-mandated National Organic Standards Board (NOSB) all participate in reviewing any synthetic substance proposed for the National List. A substance may be allowed only if the Secretary determines, in consultation with EPA and HHS, that it:

- is not harmful to human health or the environment
- is necessary due to the absence of natural substitutes
- is consistent with organic farming and handling practices (7 U.S.C. § 6517(c)(1)(A))

→ Only about 25 synthetic substances meet this standard. Every one faces more scrutiny, not less, than conventional pesticides.

4) “Organic does not mean pesticide-free” is incomplete and misleading as stated.

Organic is not marketed as “pesticide-free.” It is a transparent, public, and democratically defined

standard governing far more. In addition to pesticide restrictions mentioned above it also has standards for:

- Soil health
- Biodiversity and ecosystem management
- Animal welfare
- Processing methods
- GMOs
- Prohibitions on PFAS-containing sewage sludge (“biosolids”)
- Traceability, product segregation, and annual inspections

More importantly, USDA’s own Pesticide Data Program (PDP) consistently demonstrates that organic products have significantly lower pesticide residues than both conventional products and products marketed with unverified labels such as “pesticide-free.”

→ ***Leaving out this federally collected evidence undermines the stated goal of “full disclosure.”***

Why these omissions matter

When EPA presents selective or technically inaccurate comparisons, particularly while correcting others’ misinformation, it risks deepening the trust challenges the Agency already faces among consumers, farmers, and communities concerned about chemical exposure.

We urge EPA to avoid messaging that sidelines or diminishes a federally regulated agricultural system that contradicts defending the Agency’s credibility on PFAS. The science, the statute, and the data are abundantly clear. Organic is not simply “consumer preference”; it is a rigorously defined public standard grounded in environmental health, human health, transparency, and trust—values that EPA also upholds.

We encourage EPA to revise Fact #5 to reflect the actual legal framework, the data, and the Agency’s own role in organic oversight, and to ensure that future communications avoid inadvertently spreading misconceptions about a USDA-regulated program.

Thank you for your attention, and for your continued work protecting public health. OTA stands ready to provide technical assistance or additional information at your convenience.

Sincerely,



Tom Chapman
Co-CEO
Organic Trade Association