



April 7, 2015

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket:** AMS-NOP-15-0002

**RE: Crops Subcommittee – 2017 Sunset Summary: Lignin Sulfonate**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the Crops Subcommittee (CS) and National Organic Standards Board (NOSB) on its 2017 Sunset Review of Lignin Sulfonate (LS).

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect the growth of organic trade to benefit the environment, farmers, the public and the economy.

#### **Use Patterns of Lignin Sulfonate as Chelating Agent/Dust Suppressant**

As NOSB acknowledges, LS is allowed as both a chelating agent/dust suppressant (typically used for controlling dust on farm roads or in the manufacturing of "prilled" fertilizers and soil amendments) and as a floating agent in post-harvest handling of organic crops. It is critical to evaluate LS' potential environmental effects within the context of these different use patterns. When LS is used as a chelating agent/dust suppressant, it is tightly bound to soil or fertilizing material particles, and poses a lower risk of entering aquatic ecosystems as a whole, un-degraded molecule than when used as a floating agent in post-harvest handling where it may enter aquatic ecosystems through waste water discharge. However, as further explained below, OTA's outreach to the commercial organic pear industry has indicated that no certified organic pear handlers continue to use LS as a floating agent. Therefore, considering the addition of a burdensome OSP waste water monitoring requirement is not necessary because the substance should be removed entirely from the National List as an allowed synthetic floating agent.

#### **OTA Petition to Remove Lignin Sulfonate as an Allowed Synthetic Floating Agent**

OTA submitted a petition on November 6, 2014 to remove LS from the National List as an allowed synthetic floating agent in post-harvest handling of organic crops, and NOP determined the petition to be complete and forwarded it to NOSB on December 18, 2014. This substance was primarily used in the organic pear industry as a floating agent in organic packing sheds. OTA's outreach to the organic pear industry indicated that no companies currently handling organic pears use LS, as most have moved to modernized equipment that does not require the use of flume water to transport fruit down the packing

line. The few companies that continue to pack pears using flume water use other allowed floating agents (sodium silicate, sodium carbonate, or potassium carbonate) mainly because of LS' incompatibility with chlorine sanitizers used for food safety concerns. The removal of LS from the National List will not directly result in the increased use of other floating agents because the few companies continuing to use wet packing lines have already made the switch to other allowed substances.

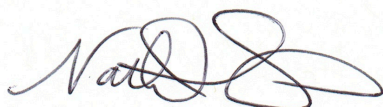
### **Conclusion**

It is critical that NOSB's Sunset review of LS take into account the dramatically different use patterns allowed for this substance (as a chelating agent) and the different level of risk each use pattern may pose to aquatic ecosystems. We also encourage NOSB to use the information contained in OTA's petition to remove LS as a floating agent in post-harvest handling in its Sunset review of this substance. NOSB now must consider our petition to remove this substance as well as the review required by the regular five-year sunset cycle.

- We encourage NOSB to bring forth a recommendation to remove LS from the National List as a floating agent in post-harvest handling because it is no longer necessary or essential for organic handling.
- We also encourage NOSB to conduct its 2017 sunset review of LS as a chelating agent/dust suppressant *separately* from the review of LS as a floating agent since the differences in use patterns, and their subsequent potential effects on the environment, require individual evaluation.

On behalf of our members across the supply chain and the country, OTA thanks NOSB for the opportunity to comment and for your commitment to furthering organic agriculture.

Respectfully submitted,



Nathaniel Lewis  
Senior Crops and Livestock Specialist  
Organic Trade Association

cc: Laura Batcha  
Executive Director/CEO  
Organic Trade Association