

April 4, 2019

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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-18-0071
Federal Register Number: 2018-25572

Dear National Organic Standards Board Members:

The following comments are submitted to you on behalf of The Cornucopia Institute.

Cornucopia supports Beyond Pesticides' comments in their entirety and hopes you will consider their expertise on these issues as paramount in the industry.

Silver dihydrogen citrate petition

Cornucopia **opposes** the listing of the petitioned substance silver dihydrogen citrate (SDC).

SDC 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 the unsanitary production and handling practices so common in conventional livestock production.

Not only are there alternative methods to maintain cleanliness, there are safety concerns regarding SDC. 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 that organic agriculture relies upon.

In addition, there are concerns about human health associated with the use of SDC. Specifically, there are concerns that microbes will form resistances to silver-based medications important as a line of defense against many human infections.

In general, there should be a very high bar to list further materials and methods to 7 CFR §205.601, and the above substance does 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 SDC is not.

Allyl isothiocyanate petition

Cornucopia **opposes** the listing of petitioned substance allyl isothiocyanate (AITC).

AITC is pre-plant fumigant proposed as an allowed synthetic substance in organic crop production (§ 205.601). 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 and should not be included in the National List.

Marine materials in organic crop production

Ocean ecosystems are fragile and under threat from climate change (including ocean acidification), as well as shipping and other direct human activities. We concur with the public comments that organic agriculture should not contribute to the problem of contamination and harm to ecosystems. To do so would be incompatible with the basic principles of organic agriculture.

To this end we concur with Beyond Pesticides that there *must* be enforceable protective rules for the use of marine materials in organic production. As the subcommittee addresses in the discussion document, there are many potential pitfalls associated with the use of marine algae.

We would support an annotation in any listing of marine algae that would create specific, enforceable rules for the harvest of the material and the protection of the biodiverse ecosystems these wild materials are part of. This would prevent an arbitrary alteration to how marine algae are used in organic production but would still allow the NOSB to review said annotation every five years (so that it can be altered to account for changing environmental conditions).

We appreciate that the NOSB is exploring the best means of accounting for and minimizing the environmental impact of marine algae used in organic crop production inputs. In the future this kind of detailed analysis should be done for every marine product or material; in most cases, rules that currently apply to land-based materials cannot be easily translated to marine products.

DL-Methionine sunset

Cornucopia supports the complete re-examination of the necessity of synthetic methionine in poultry diets, with the end goal of lowering or phasing out the allowed amounts of methionine in poultry diets. Overall, Cornucopia believes that synthetic methionine is not compatible with organic principles and should be phased out; at a minimum, an expiration date to the listing should be added to push the issue. With the proper incentive, natural alternatives (including management changes and dietary additions) can be substituted for synthetic methionine.

Methionine is required for proper cell development and feathering in poultry and has been added in synthetic form to organic poultry feed since the inception of the National Organic Standards

¹ TR lines 687-689.

under the Organic Foods Production Act (OFPA). Synthetic methionine is currently allowed in organic production at a set rate of pounds of synthetic 100 percent methionine per ton of feed in the diet: laying chickens—2 pounds; broiler chickens—2.5 pounds; turkeys and all other poultry—3 pounds.

We have concerns that synthetic methionine is being used principally as a production tool at current rates of administration. If accurate, this would not be compatible with organic agriculture. The argument that synthetic methionine is a dietary supplement essential for animal welfare is also incorrect: high animal welfare is predicated on a natural diet and time spent outdoors performing natural behaviors (which in the case of poultry includes foraging).

Organic farmers that are dedicated to organic ideals raise their meat chickens and egg-laying hens on pasture, in compliance with the organic rules that require them to spend time outdoors. Pasture-raised poultry are likely to forage, acquiring more natural methionine from their diet. It is indoor confinement that limits this natural availability of methionine.

Fixed houses—the industry standard in conventional agriculture—may have doors leading to the outdoors, but often no more than 10% of the birds use the outdoor space provided. Outdoor runs are often of poor quality (having little to no vegetation), if they are present at all.

Foraging on pasture contributes to a natural source for methionine. Since organic poultry production is intended to use pasture-based methodology, the NOSB should re-examine the current allowed level of synthetic methionine.

One reason we request this re-examination is that there are potential alternative sources of methionine. These sources have not been considered by the NOSB recently. For example, omnivorous birds like chickens and turkeys consume insects as part of their ancestral diets. Raising insects to supplement poultry diets may be a more natural route to supplement this essential amino acid: current research into black soldier fly larvae indicates that they could be a promising source of natural methionine in poultry diets.

General comments on organic integrity

The organic label's system of checks and balances has strayed from the principles that formed the organic movement.

Consumers, farmers, and public interest organizations feel their voices are not being heard by the USDA or the NOSB. Inevitably, this will lead to a backlash against the organic label, which will hurt family farms more than the corporate interests who are putting them out of business. This goes against the purpose behind organic legislation.

We have hope that the industry will come together to stand for what sets the organic label apart from other agriculture: a dedication to healthy soil, outdoor access for livestock, and greater economic support for family farms.

Sincerely,

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