



# BEYOND PESTICIDES

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National Organic Standards Board  
Spring 2014 Meeting  
San Antonio, TX

## Re. HS: Glycerin

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 (HS) proposal to remove synthetic glycerin from the National List §205.605(b), given that there are organic nonsynthetic forms of glycerin available. This is the kind of progress anticipated by the authors of the *Organic Foods Production Act* in designing a National List with mechanisms for reconsideration and removal.

According to the HS proposal, organic glycerin may be produced by either "microbial fermentation using only mechanical and biological processes as required in §205.270(a) without the use of allowed synthetics listed in §205.605(b)" or by "hydrolysis of organic fats and oils using either steam splitting or traditional saponification with a catalytic amount of an alkali (sodium carbonate, sodium hydroxide, or potassium hydroxide) on the National List." Although we support this particular petition, we note that a large number of potential ingredients in organic products may now be produced through microbial fermentation, and we urge the NOSB and NOP to develop process-based standards for ingredients that are products or byproducts of microbial fermentation. This is not the same as an allowance of "microorganisms."

Glycerin is also listed on §205.603 as a teat dip. Does it require a whole new petition to get the Handling Subcommittee to share its information with the Livestock Subcommittee? Is it possible to also remove glycerin from §205.603?

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.  
Board of Directors