



# BEYOND PESTICIDES

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April 1, 2019

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave. SW.,  
Room 2648-S, Mail Stop 0268  
Washington, DC 20250-0268

**Docket ID # AMS-NOP-18-0071-0001**

## **Re. LS: Oxalic acid**

These comments to the National Organic Standards Board (NOSB) on its Spring 2019 agenda are submitted on behalf of 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, Beyond Pesticides 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 the world.

Oxalic acid is petitioned for use in controlling varroa mites in organic beehives.

We are concerned about the many challenges facing beekeepers, and we would like to hear from beekeepers about the efficacy and risks associated with oxalic acid and other materials and practices for managing varroa mites. The technical review of oxalic acid identifies hazards and cautions associated with use of oxalic acid, as well as a number of alternative materials and practices.

In addition, since there are no practice standards for organic apiculture, the NOSB lacks a framework for making a decision on this and other materials used by organic beekeepers. We suggest, therefore that this petition be put on hold until such standards are adopted.

Beyond Pesticides suggests that a panel of organic beekeepers would be helpful to the NOSB and NOP in prioritizing apiculture standards and making decisions concerning materials used in organic apiculture.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.  
Board of Directors