



BEYOND PESTICIDES

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September 17, 2018

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

Re. LS: Oxalic acid

These comments to the National Organic Standards Board (NOSB) on its Fall 2018 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 cannot add to the information concerning oxalic acid in the Livestock Subcommittee's discussion document. 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.

However, 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.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors