



BEYOND PESTICIDES

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National Organic Standards Board
Fall 2012 Meeting
Providence, RI

Re. Rotenone (Crops)

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.

We support the recommendation of the Crops Subcommittee to list rotenone on §205.602, prohibited nonsynthetic materials. Even though the Environmental Protection Agency's registration for rotenone was voluntarily cancelled for all uses except as a piscicide in 2006—and thus rotenone is not allowed in organic production—one only needs to search the web to find that there is a widespread misconception that organic farmers still use it. For example, the Wikipedia article on rotenone says, "Rotenone is classified by the USDA National Organic Program as a nonsynthetic and was allowed to be used to grow organic produce until 2005, when it was added to the list of prohibited substances due to concerns about its safety. However, it has since been reapproved." Organic agriculture is widely criticized for still using rotenone, which is associated with Parkinson's disease and other central nervous system damage.

So, even though the listing of rotenone on §205.602 will not make a difference legally, we support it for its clarifying effect.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors