



Texas Organic Cotton Marketing Cooperative

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National Organic Program
USDA-AMS-TMP-NOP
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Re: Petition on Hydrogen Chloride; April 28 NOSB meeting.

As the primary marketer of organic cotton grown in Texas, the Texas Organic Cotton Marketing Cooperative is against the NOSB Crops Committee's proposal that hydrogen chloride not be added to the list of allowed or regulated substances. Our reasons and comments on the recommendation and the TAP review are detailed below.

As stated in the coop's petition, we are requesting that the NOSB allow the restricted use of hydrogen chloride in the process of delinting organic cottonseed because we have no alternatives.

First of all, there is no commercially available organic cottonseed; second, there is not any commercially available non-organic cottonseed that is not acid delinted; third, planting undelinted ("fuzzy") seed is not an option with mechanized planting; and fourth, there are no commercially available alternative processes of delinting the seed or otherwise making the fuzzy seed suitable for planting.

The Crops Committee and the TAP reviewers suggest the use of lactic acid or acetic acid as alternatives, but acknowledge that these may not be effective. All of the delinters and others with expertise in the delinting process that we have talked to agree that these acids would not work satisfactorily. One of the persons we discussed this with was Dr. Gay Jividen, retired Senior Director of Research for Cotton Inc., who was co-developer of the dilute acid delinting process (using sulfuric acid). Dr. Jividen stated in a phone conversation April 14, 2004, "Acetic

acid and lactic acid would not be suitable alternatives for commercial delinting of cottonseed. These acids are too weak to remove the lint in a short enough time to prevent damage to the seed."

As far as alternative processes of delinting, we have pursued and are continuing to pursue any possibilities that we find. We are working with Tom Wedegaertner, Director of Cottonseed Research and Marketing for Cotton Inc., on starch coating the fuzzy cottonseed to make it usable in mechanical planters. Wedegaertner, who has been involved with Cotton Inc. in the development of Easiflo cottonseed for the feed industry, is now trying to improve the process for planting seed. We have sent him 250 pounds of fuzzy cottonseed for a trial in his pilot plant, if he is able to get it going. However, Wedegaertner indicates that at best, commercial availability of planting seed using this process is several years away. Also, another company, L.T. Kincer Co., is working on an enzyme delinting process, but here again, it is in the developmental stage and is a few years away from commercial availability.

We have also looked into mechanical delinting options, but, because of various problems, have not found anything that is a viable solution. One of the biggest hindrances to finding an alternative to delinting with hydrogen chloride, whether it would be trying organic acids or special mechanical delinting, is that no commercial delinting company is willing to do anything out of the ordinary for the small quantity of planting seed needed by organic producers.

We have difficulty even obtaining acid delinted seed that is not treated with various chemical seed treatments. The large seed companies will not provide untreated seed at all. We are fortunate that one small seed company has been very good to provide us with untreated planting seed and a few local delinters will delint producer caught seed and leave it "black" (no chemical seed treatments). However, even these who have provided us black seed are not at all interested when approached about alternatives to hydrogen chloride because our volume is so small.

The TAP review mentions that "organic cotton production is a more than \$100 million dollar-a-year business." However, the current annual farm value of cotton sold in the organic market is approximately \$2 million for production in the United States and \$15 million worldwide.

The TAP review also touches on the issue of whether "the use of hydrochloric acid as a delinter means HCl is being used as a processing aid or a seed treatment." It is our position that it is a processing aid, not a seed treatment, because of, among other reasons, the fact that the EPA does not require that it be registered as a seed treatment.

The criticalness of the issue of organic cotton producers' ability to plant seed that has been delinted using hydrogen chloride cannot be overemphasized. The

members of our cooperative produce a large majority of the organic cotton grown in the United States. All of our members use seed that has been delinted with HCl, and as far as we know, all other producers in the country do also.

As has previously been stated, we have no alternatives at this time. If organic producers were to be decertified for the use of this seed, it would eliminate organic cotton production in the U. S. If that happens, 4,000, or more, acres would return to conventional cotton production because there are no other economically viable organic crops in this arid region.

It would be especially regrettable for this to happen at this time because the demand for organic cotton appears to finally be taking off. Our cooperative and others have worked very hard for many years to develop the organic cotton industry. It would be a tragedy, if, just at the point there is the potential for converting significant acres of cotton to organic (with the accompanying reduction in pesticide use), the seed issue is allowed to eliminate domestic organic cotton production.

We urge you to recommend that hydrogen chloride used for delinting cottonseed be considered a processing aid and to allow hydrogen chloride for use in organic production for delinting cottonseed. The Texas Organic Cotton Marketing Cooperative will continue to pursue both mechanical and organic solutions for the process and will inform you as soon as we have found one.

Sincerely,



James L. Wedel
President