

VOGLER ORGANIC FARM

Jerry Vogler

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Katherine Benham
National Organic Program
USDA-AMS-TMP-NOP

Re: Petition on Hydrogen Chloride at April 28 NOSB meeting

Dear NOSB:

My wife and I have grown organic cotton since 1993. We have a serious stake in the upcoming NOSB ruling on the use of hydrogen chloride to delint fuzzy cottonseed for planting purposes. We are strongly against the NOSB Crops Committee's proposal that hydrogen chloride not be added to the list of allowed or regulated materials.

As a farmer I have absolutely no fear of health hazards to myself when I am pouring the delinted seed into the planter boxes. After all, the seed are neutralized due to the application of calcium carbonate. The delinting residue on the seed is calcium chloride (CaCl_2) which is added to pickles. Soil organisms should also be unharmed. If the seed were acidic the acid would ruin the seed coats and kill the seed. Also, if the seed were acidic the paper bags containing the seed would be deteriorated, and I assure you that no deterioration is detectable on bags that have been stored for years.

The review panels have focused their attention on off-the-farm activities at the delinting plants. They have failed to address the more pertinent issue of the impact of neutralized seed being placed in organic soil. They have not shown a danger at the farm from a ph neutral seed. Any hazards to humans are exclusively at the delinting plant, but there they have the equipment and expertise for do safe handling. If mechanical delinting existed it would also pose some physical dangers. What manufacturing facility does not? I am offended by review panel comments which tell you that we farmers are acidifying the soil in our fields by adding HCl. I must stress that all we put into our fields is non-acidic seed. Seed stored with acid on them would obviously never germinate.

Using controlled air velocity, seed delinters separate lightweight immature seeds from good seeds. The cull rate is usually 15% -20%. Dairies buy and feed the delinted seed which have been culled out, and dairy farmers are picky about their feed. This should tell you how non-acidic and safe the seed is. The dairies even buy the lint fuzz that scrubbers have removed from the seed.

You should also know that Lamesa Delinting (phone: 806-872-7245) where I do business is located in town with residential housing against it on three sides while the fourth side has more houses only two blocks away.

The most important thing before the NOSB is whether the **neutralized seed** that we place into our organic soil is in any way unsafe to humans and soil organisms. No arguments have been presented to show any hazard in the field. Furthermore, I have no difficulty considering the acid use to be an aid in processing the seed from fuzzy to black seed.

I think you should by now suspect some of the anti-acid arguments that others have presented to you are overblown. I realize that the HCl used is not collected from a natural source, but I know enough about chemistry to know that it is no different from the HCl in our stomachs.

All we ask is that HCl be allowed but be restricted to be used for this one and only use as a processing aid. If your ruling takes that tool from us, the organic cotton industry will end in this country. That would be a detriment to the environment you are trying to protect because my wife and I and the other growers would go back to conventional farming. That means that we would continue going to the acid delinters anyway and on top of that would probably order treatment with Captan fungicide and possibly Lorsban insecticide and treat the fields with trifluralin herbicide, apply synthetic fertilizer, pyrethroid insecticide if needed for bollworms, spray other chemicals if needed for thrips, fleahoppers, or aphids, and finally defoliate the crop rather than make the crop wait for a freeze. I don't mean this at all as a threat, but it is important to look at reality. We simply could not afford to farm by organic methods if our crop could not be certified organic and sold at an organic price.

Respectfully submitted,

Jerry Vogler