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

I am a TDA certified organic cotton producer on the High Plains of Texas. I have been producing organic cotton since 1993. I am opposed to the NOSB Crops Committee's recommendation that hydrogen chloride not be added to the list of substances allowed, or allowed with restrictions, for the following reasons:

1. There is no commercially available organic cottonseed;
2. There is not any commercially available non-organic cottonseed that is not acid delinted;
3. Planting undelinted ("fuzzy") seed is not an option with mechanized planting.
4. There are no commercially available alternative processes of delinting the seed or otherwise making the fuzzy seed suitable for planting; and
5. The hydrochloric acid is not actually applied to the soil, as it is applied to the seed at the delinting plant, and is neutralized by calcium carbonate before it is bagged and shipped to the farm.

The Texas organic farmers have pursued numerous other options, but no viable alternatives have been found. Lactic and acetic acid were suggested by the TAP reviewers, but our seed delinters have informed us that these acids are not strong enough to remove the lint. Other means have been researched, but are not fully developed yet.

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." The EPA does not register HCl as a seed treatment. The delinting industry generally defines "untreated" cottonseed as seed that has been through the acid delinting process, neutralized by calcium carbonate, with no fungicides or insecticides added to it. Therefore it is my position that it is a processing aid, not a seed treatment.

The beneficial effects to the environment of growing organic cotton are tremendous. In Texas alone, there are over 5,000 acres of organic cotton produced annually. Conventional cotton typically uses more pounds of pesticides per acre than any other commercial crop. If hydrogen chloride delinted cottonseed is not allowed to be used, organic cotton production in the U. S. will be virtually eliminated. Thus without the use of this minute amount of hydrogen chloride for delinting purposes, organic cotton

producers will have little choice but to return their land to conventional cotton production methods and add thousands of pounds of chemicals to the environment.

I want to stress that we are working to develop alternative methods, but if hydrogen chloride is not added to the National List of allowed or regulated materials, our only option will be to continue to comply with the National Organic Standards (below) and to plant conventionally grown untreated cotton seed that has been through a delinting process.

§ 205.204 Seeds and planting stock practice standard.

(a) The producer must use organically grown seeds, annual seedlings, and planting stock: Except,
That,

(1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available...

I urge you to allow a specific exemption for the use of hydrochloric acid as a processing aid for delinting organic cottonseed.

Sincerely,



Susan G. Wedel