

From: Terry Pepper [tpep@poka.com]
Sent: Wednesday, April 21, 2004 9:02 AM
To: Benham, Katherine
Subject: Comments to NOSB

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April 19, 2004

Katherine Benham
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave.
SW. Room 4008-So. Ag Stop 0268
Washington, D.C. 20250-0200

Re: Petition on Hydrogen Chloride; April 28 NOSB meeting

As one of the original growers of certified organic cotton in Texas I would like to go on record as being opposed to the NOSB Crops Committee proposal concerning hydrogen chloride use in the process of delinting organic cotton seed.

Hydrogen chloride is a substance that I agree is not something we like to use, however at this point we have no viable alternatives to use in the delinting process. The committee suggested alternative natural acids could be used but none of them are strong enough to remove the lint in a short enough time to prevent damage to the seed.

The delinting process with hydrogen chloride uses a minute amount of acid. By weight a .6% mixture of hydrogen chloride and seed is used and then is totally neutralized. Therefore no hydrogen chloride goes with the seed into the soil on my farm or for that matter goes anywhere else.

There were some reviewer's comments and conjecture that the delinting process be considered a seed treatment. A seed treatment is something that is put on the seed and stays on the seed and goes into the soil. Treatments must have EPA approval. Even conventional seeds do not have EPA approval for hydrogen chloride because it is not on the seed when it leaves the delinting plant. Therefore hydrogen chloride is not a treatment it is a processing aid used in the preparation of planting seed.

Banding together as a group, the Texas Organic Marketing Cooperative has been and will continue to pursue alternative methods of preparing cotton seed for planting. Some of the options have potential but are still a few years out.

I urge you to recommend that, until a better method can be put in production, hydrogen chloride be allowed on a restricted basis for the processing of organic cotton planting seed.

Thanks for your consideration,

Terry Pepper