# NOSB NATIONAL LIST FILE CHECKLIST

## **CROPS**

MATERIAL NAME: #12 Soap-based herbicides

NOSB Database Form

References

MSDS (or equivalent)

TAP Reviews from: David Pimentel, James A.

Johnson, John Clark, Chris Milne, Diana Tracy

## NOSB/NATIONAL LIST COMMENT FORM CROPS

Material Name: #12 Soap-based herbicides

MANSikon

Please use this page to write down comments, questions, and your anticipated vote(s).

COMMENTS/QUESTIONS:
Codex - Not clear
EU - Not clear - emergary only?
IFOAM-Pohibika
DE, MS, BL, JK -
Twas once
Von tood use only VC/DE/RC/BP/ FC/SU/BL/MS/BAJKM No
KC/DE/RYBIC
JG/FK/BL/MS/BAJKM NO
Roadways, ditder, rights of way, brildys, field aggs.  6 mountain crops fails 7-4  1. In pay opinion, this material is:
6 movements crops tails 7-9
1. In my opinion, this material is:  Synthetic Non-synthetic.
<ol> <li>This material should be placed on the proposed National List as:</li> <li>Prohibited NaturalAllowed Synthetic.</li> </ol>

This file is due back to us by: Aug. 5, 1996
Name of Material: Soap-based Herbicides
Reviewer Name: David Pinentel RECFIVEN !!!! 25 100
Is this substance Synthetic or non-synthetic? Explain (if appropriate)
If synthetic, how is the material made? (please answer here if our database form is blank)
This material should be added to the National List as:
Synthetic Allowed Prohibited Natural
or, Non-synthetic (This material does not belong on National List)
Are there any use restrictions or limitations that should be placed on this material on the National List?
Please comment on the accuracy of the information in the file:
Any additional comments? (attachments welcomed)
Do you have a commercial interest in this material? Yes; No
Signature Danie Date 1/11/96

# Please address the 7 criteria in the Organic Foods Production Act: (comment in those areas you feel are applicable)

(1) the potential of such substances for detrimental chemical interactions with other materials used in organic farming systems;

Minime/

(2) the toxicity and mode of action of the substance and of its breakdown products or any contaminants, and their persistence and areas of concentration in the environment:

Toxic to other plants.

(3) the probability of environmental contamination during manufacture, use, misuse or disposal of such substance;

With care there should be a minimal Problem.

(4) the effect of the substance on human health;

Careful use is required

(5) the effects of the substance on biological and chemical interactions in the agroecosystem, including the physiological effects of the substance on soil organisms (including the salt index and solubility of the soil), crops and livestock;

TOXIC To Cups

(6) the alternatives to using the substance in terms of practices or other available materials; and

Plain Rot water is equally effective and does not have ony side-effects.

(7) its compatibility with a system of sustainable agriculture.

For total weed Mill only.

This file is due bac	k to us by: _	Aug. 5, 19	16
Name of Material:			
	~		RECEIVED JUL 3 0 199
Is this substance Sy appropriate)  If synthetic, how is form is blank)	actic - natural	ly octually plant	olain (if  and animal SUESTACE  if our database  yellow are are a cons
This material should Synthetic All		the National L	
Are there any use in placed on this mate	restrictions or		
Please comment on the $VOY = VOS = 0$	· .	information in th	ne file:
Any additional com	ments? (attach	ments welcome	d)
Do you have a commer	cial interest in t	his material?	_ Yes; No
Signature Dames	a Johnson	$\sim$ Date $\frac{7/29}{}$	7/96

# Please address the 7 criteria in the Organic Foods Production Act: (comment in those areas you feel are applicable)

- (1) the potential of such substances for detrimental chemical interactions with other materials used in organic farming systems; Stable material, Flash point >200°F No known materials that are incomparible.
- (2) the toxicity and mode of action of the substance and of its breakdown products or any contaminants, and their persistence and areas of concentration in the environment; LD50 > 5000. (Aution). unknown mode of action. It does not translocate in plant, will not move through soil to injure nearby plant. No hazardous accomposition products or polymerization.
- (3) the probability of environmental contamination during manufacture, use, misuse or disposal of such substance; -/--
- (4) the effect of the substance on human health;

  Harmful if swallowed. May cause eye irritation. Chronic oral
  consumption of ethyl accohol hakei to birth defects and cancer in
  fundamental contamination of feed and Goodstuffs.
- (5) the effects of the substance on biological and chemical interactions in the agroecosystem, including the physiological effects of the substance on soil organisms (including the salt index and solubility of the soil), crops and livestock;

  Avail Contamination of Investock feed and foodstuffs. Will sovely knock out regetables as quickly as weeks!
- (6) the alternatives to using the substance in terms of practices or other available materials; and flower cords cultivation mulch-plant (nong of dies and plastics crops rotation—here, known to kill 95% of competitive cred, buried drip irrigation, citrus oil, other botanicals, geese
- (7) its compatibility with a system of sustainable agriculture. My blas is to not use this inaterial in everyday organic farming. It doesn't fit the philosophy. Portions in an economic emergency or transitional farmers just beginning the custainable move.

This file is due back to us by: Aug. 5, 1996
Name of Material: Soap-based Herbicides
Reviewer Name: Christopher-PAUL Milne RECEIVED AUG 0 7 199
Is this substance Synthetic or non-synthetic? Explain (if appropriate)  Synthetic
Synthetic Synthetic If synthetic, how is the material made? (please answer here if our database form is blank)
This material should be added to the National List as:
X Synthetic Allowed Prohibited Natural
or, Non-synthetic (This material does not belong on National List)
Are there any use restrictions or limitations that should be placed on this material on the National List?
Yes! See Attached connexts
Please comment on the accuracy of the information in the file:
Any additional comments? (attachments welcomed)
Do you have a commercial interest in this material? Yes; X No
Signature Attorti- lul Mily Date 8/5/9/

## **NOSB Materials Database**

#### Identification

Common Name

Soap-based Herbicides

Chemical Name

Other Names

Superfast, Safer Home, Deck & Patio Moss Algae Killer

Code #: CAS

Code #: Other

N. L. Category

Synthetic Allowed

MSDS

yes ○ no

## Chemistry

Family

Composition

50% Potassium Salts, 30% Alcohols

-Clear, Colorless liquid, alcoholic odor

**Properties** 

-Potassium salts of fatty acids

Soluble

VAPOR pressure of 100 Ton At 35°C

How Made

Made from naturally occurring plant oils and animal fats

## Use/Action

Type of Use

Crops

Specific Use(s)

Herbicide for non-food crops only.

Controls:moss, algae, lichens, liverworts, chickweed, pigweed, lambsquarters, shepards

purse

Action

Disrupts natural waxy protective surface of weeds, damaging cell walls, causes

plant to dehydrate.

Combinations

#### Status

**OFPA** 

May not be used for food crops.

N. L. Restriction EPA, FDA, etc

42697-10; Superfast(42697-22); EPA RED (Reregistration Eligibility Do current) completed

**Directions** 

See label

Safety Guidelines

Use good ventilation, latex rubber & splash goggles. Protect from freezing

Historical status

InternationI status

Ethanol Not AN INExt of Toxicological Concern As of Nov/1984 (54 FR 48315)

## **NOSB Materials Database**

## OFPA Criteria

No reactive incompatabilities but environmental conditions, micronotrients, fertilizers and other additives may affect tendency of plants to being burned. 2119(m)2: toxicity & persistence Active ingred Breaks down rapidly in soil (i.e. 48 hos.). Does not translocate in the plant. Will not move through soil to Nearby plants. However, plants with hairy leaves (e.g. 2119(m)3: manufacture & disposal consequences

African Violets) can had solution + get brised Users Should Not contaminate water, food or feed. Do not freeze or store in excessive heat.

#### 2119(m)4: effect on human health

-Consumption can cause birth defects and cancer (HERP %, Hunger Equivalent Rodert Potency, of

-Harmful if swallowed

-Avoid contamination of feed and foodstuff

ethyl Alcohol in nine, beet And have lique ranges from 0.4 to 1.6 to 1.3 respectively. For compatison, HERP do of PCBs in food was . OI)

2119(m)5: agroecosystem biology Plant varieties differ in their susceptibility to bring.

At hister rates of application (296) burning and stending are more likely.

2119(m)6: alternatives to substance Any of a variety of NON-chemical weed control management practices.

2119(m)7: Is it compatible? H's compatability with sustainable agriculture and organic production principle appear to stem from the fact that it may be very nearly the only chemical weed control regent available for our purposes. It's harmful effects were proup and are manageable and it seems to belong to a class of substance AVE known and are manageable and it seems to belong to a class of substance AVE known and are manageable and it seems to belong to a class of substance specifically mentioned in section 2118 (c) (1) (B) (i) as eligible for an exemption. References

Ringer Corporation: 612-941-4180 COMMON-Sense Pest Control, Oltowski et Al, 1991, TAUNTON Press, Newtonn, CT. Clivical Toxicology of Commercial Products, Gosselin et Al, 5thed., 1984, Williams & Williams. Noticent And Posticide: Best Management Practices for Wisconsin FARAS, WOATER

STATUS OF PESTICINES IN REREGISTRATION AND SPECIAL REVIEW, USEPA, TUNE 1944 Doc.# EPA 738-R-94-008

#### Soap-based Herbicides

#### Synthetic or Non-synthetic

I don't think there is much doubt that this product is derived by chemically changing a substance extracted from naturally occurring plant or animal sources and is therefore synthetic.

#### National List Considerations

It should be granted an exemption as a synthetic allowed. It appears from the literature to be one of a very few non-physical weed control agents which could plausibly be compatible with sustainable agriculture since it seems to belong to a category (i.e. "soaps") specifically mentioned in the Act under section 2118 (c) (1) (B) (i) as a category for exemption consideration.

Its health impacts are at least well demarcated and could be mitigated. The major risks are probably not to consumers but to the users of the pesticide from the inert ingredient in one of the formulations which is 30% ethyl alcohol and 3% methanol according to Gosselin's formulary for an earlier version of this Safer product. The ethyl alcohol is a serious carcinogen by the oral route, a poisoning hazard, and an irritant. The health risks are more significant for the users than for food crop consumers since it is not likely to be a persistent chemical, should volatilize readily, and will not be applied directly to food crops.

#### Restrictions

The purpose of maintaining this chemical on the National List is to preserve it for "emergency" not routine use. It is hazardous for the user and is only compatible with sustainable agriculture when its use "is necessary...because of unavailablity of wholly natural substitute products". I recommend that its use should be conditioned with the requirement that the would-be user petition the local certification board or agency in writing and keep a record of the use, a copy of which is sent to the certification board. Since the risk for plant uptake would be related to its solubility in water, it should not be used near food crops requiring heavy irrigation, a moist environment, or within 48 hours of any appreciable rainfall, or within a week of harvesting.

Also, I would recommend that its status be reviewed in five years in order to ensure that EPA has not reclassified ethyl alcohol as a Inert of Toxicological Concern thereby rendering its exemption in conflict with 2118 (c) (1) (B) (ii). Alternatively, there could be a five-year phase-out period in order to encourage development of alternative products or formulations.

#### Herbicidal Soaps

03/16/92 - Soaps and Detergents for Insect Control

J. L. Capinera and O. N. Nesheim Capinera (904/392-1901), Nesheim (904/392-4721) VAX accounts - ENTNEM (Capinera) and ONN (Nesheim) Dept. of Entomology/Nematology and Pesticide Coordinator's Office

There have been several questions concerning the recommendation of soaps, detergents, and vegetable oils for pest control. Some persons are concerned about their liability in making such recommendations. Federal and state pesticide laws do not permit persons who have a financial interest in such materials to make pesticidal claims in connection with their sale or distribution unless the material is registered as a pesticide. Examples of persons having a financial interest are employees of the manufacturer of such products, employees of wholesale or retail establishments where such materials are sold, and pesticide applicators who make pest control claims for trade name materials in connection with pest control services they are selling to a customer. Persons making pest control claims for a material in connection with its sale can be charged with the sale and distribution of an unregistered pesticide.

Fersons who use products not registered with EPA for any use not specifically recommended on the product label would be responsible for any phytotoxicity or chemical residues that may result.

A person at his/her own discretion can use soaps, detergents, and vegetable oils for pest control purposes. It is not illegal to recommend (or suggest) the use of these materials. These materials have been used for many years by gardeners and others for pest control. Popular literature contains many references to their use and effectiveness. Evaluations of these materials for pest control has been published, also.

The effectiveness of soaps, detergents, and oils is less consistent than with chemical pesticides. Our research base also is considerably weaker than with many chemicals. Therefore, we are more comfortable with "discussing" soaps, etc. as options, than with actually "recommending" these materials. Although some growers have been quite pleased with the results of soap and oil use, some have been disappointed. Also, plant varieties differ in their susceptibility to burning induced by soaps and oils, and environmental conditions, as well as micronutrients, fertilizers, and other additives may affect tendency to burn. At higher rates of application, (2%) burning and stunting are more likely.

When discussing soaps, detergents, and vegetable oils for pest control

purposes, avoid recommending by brand name. Point out that there are registered products available that contain these materials, such as the Safer and Mycogen Soap products.

Sample footer

This file is due back to us by: Aug. 5, 1994
Name of Material: Soap-based Herbicides Reviewer Name: John Clark RECEIVED JUL 2 5 1998
Is this substance Synthetic or non-synthetic? Explain (if appropriate)
If synthetic, how is the material made? (please answer here if our database form is blank)
This material should be added to the National List as:
Synthetic Allowed Prohibited Natural
or, Non-synthetic (This material does not belong on National List)
Are there any use restrictions or limitations that should be placed on this material on the National List?
Please comment on the accuracy of the information in the file:
Any additional comments? (attachments welcomed)  No review possible - to alwered a class. The hund-none products shown clearly  Violate The huner-heath effects exterior. The use of this product is whelly  incompatible with an organic paradigm & inappropriate in an organic site or  environment who would aryone petition for approach of this product value OFPA  Do you have a commercial interest in this material? Yes; No
Signature Date

This file is due back to us by: Hug. 5, 199	<u></u>
Name of Material: Soap-based Her	
Reviewer Name: DIANA TRACY RECEIVED	AUG 0 5 1996
Is this substance Synthetic or non-synthetic? Explanation appropriate)  SYNTHETIC  If synthetic, how is the material made? (please answer here is form is blank)	· · · · · · · · · · · · · · · · · · ·
	·
This material should be added to the National Lis	
X Synthetic Allowed Prohibited N.	atural
or, Non-synthetic (This material does not belong on Nati	ional List)
Are there any use restrictions or limitations that splaced on this material on the National List?  NON CROPUSE ONLY	should be
Please comment on the accuracy of the information in the ACCURATE	file:
Any additional comments? (attachments welcomed)	
Do you have a commercial interest in this material?	Yes; <u>×</u> No
Signature Illana La Fracy Date 7/31/91	6

## **NOSB Materials Database**

## <u>Identification</u>

ommon Name

Soap-based Herbicides

**Chemical Name** 

Other Names

Superfast, Safer Home, Deck & Patio Moss Algae Killer

Code #: CAS

Code #: Other

N. L. Category

Synthetic Allowed

MSDS

yes ○ no

## **Chemistry**

**Family** 

Composition

50% Potassium Salts, 30% Alcohols

**Properties** 

-Potassium salts of fatty acids

-Clear, Colorless liquid, alcoholic odor

How Made

Made from naturally occurring plant oils and animal fats

## **Use/Action**

Type of Use

Crops

Specific Use(s)

Herbicide for non-food crops only.

Controls:moss, algae, lichens, liverworts, chickweed, pigweed, lambsquarters, shepards

purse

Action

Disrupts natural waxy protective surface of weeds, damaging cell walls, causes

plant to dehydrate.

**Combinations** 

#### **Status**

**OFPA** 

May not be used for food crops.

N. L. Restriction EPA, FDA, etc

42697-10; Superfast(42697-22)

Directions

See label

Safety Guidelines

Use good ventilation, latex rubber & splash goggles. Protect from freezing

Historical status

InternationI status

# NOSB Materials Database OFPA Criteria

2119(m)1: chemical interactions

2119(m)2: toxicity & persistence

2119(m)3: manufacture & disposal consequences

#### 2119(m)4: effect on human health

- -Temporary skin irritation
- -Consumption can cause birth defects and cancer
- -Harmful if swallowed
- -Avoid contamination of feed and foodstuff

2119(m)5: agroecosystem biology

2119(m)6: alternatives to substance

2119(m)7: Is it compatible?

#### References

Ringer Corporation: 612-941-4180

## RINGER CORPORATION

9959 Valley View Road, Minneapolis, MN 55344 (612) 941-4180

#### MATERIAL SAFETY DATA SHEET

Product Name: Safer® Superfast™ Weed & Grass Killer RTU

EPA Registration Number: 42697-22 MSDS Number: 5350, 5352, 5353, 5355

▶SECTION I: IDENTIFICATION

Product Description (Ingredients):

Potassium salts of fatty acids in a water/alcohol base. The exact composition of this material is proprietary.

►SECTION II: PHYSICAL & CHEMICAL CHARACTERISTICS

Bulk Density (H2O=1): 1.0 solubility in Water: Soluble. Appearance and Odor: Clear, colorless liquid, alcoholic odor.

## ►SECTION III: FIRE & EXPLOSION HAZARD DATA

F : h Point (method used): > 200°F. Excinguishing media: Use carbon dioxide or dry powder extinguisher. Special Fire Fighting Procedures: None.

SECTION IV: REACTIVITY DATA

Stability: Stable.

Incompatibility (materials to avoid): None known.

Hazardous Decomposition Products:

Hazardous Polymerization: Will not occur.

▶DOT INFORMATION: Not regulated.

SECTION V: HEALTH HAZARD DATA
OSHA PEL: 1000 ppm or 1900 mg/m<sup>3</sup>
(ethanol).

Effects of Overexposure: Product may cause irritation to eyes or skin.
Routes of Entry: Inhalation, eyes, skin.

carcinogens: Chronic oral consumption of ethyl alcohol has been linked to birth defects and cancer in humans. Emergency First Aid Procedures: Eye Contact: Flush with water. Skin Contact: Flush with water. Inhalation: Remove from area. Ingestion: Give demulcent (milk).

►SECTION VI: PROTECTIVE MEASURES

Ventilation: Good general ventilation
is normally adequate.

Respiratory Protection: Use NIOSHapproved respiratory protection if conditions warrant.

Protective Gloves: Recommended. Eye Protection: Recommended.

>SECTION VII: STORAGE AND DISPOSAL Do not contaminate water, food or feed by storage or disposal. Do not reuse container.

Storage: Do not freeze or store in excessive heat.

Spills: Rinse with water and mop up. Disposal: Dispose in accordance with all applicable federal, state and local regulations.

This information is provided in good faith, but without express or implied warranty.

Revision date: January 12, 1995 170 Emergency Phone: 1-800-228-5635, ext.





Superfast™ Brand Weed & Grass Killer

#### **DESCRIPTION OF** SUPERFASTIM .

- Superfast™ is a non-selective herbicide and will kill all plant tissue it contacts.
- Active ingredient is potassium salts of fatty acids.
- Herbicidal soap is made from naturally occurring plant oils and animal fats.

#### HOW IT WORKS

- Herbicidal Soap disrupts the natural waxy protective surface of the weed, damaging cell walls and causing the plant to dehydrate.
- It does not translocate in the plant.

#### BENEFITS OF **SUPERFASTIM**

- Kills weeds and grasses on contact.
- Herbicidal action is rapid with results visible within hours.
- Treated areas may be replanted two days after application.
- Only those plants or plant parts directly contacted by spray will be affected.
- Will not move through soil to injure nearby plants.

#### **PLANTS** CONTROLLED

- Will damage or destroy any vegetation which it contacts.
- Kills unwanted grasses and vegetation in and around flower beds.
- Controls annual weeds such as chickweed, pigweed, lambsquarter and shepherd's-purse.

#### APPLICATION RECOMMENDATIONS

- Shake well before use.
- Spray weeds or grass thoroughly to ensure good control of all types of unwanted vegetation.
- Apply to weeds during early period of growth when weeds are young and succulent.
- Several treatments may be necessary to kill actively growing weeds.
- For most rapid kill, apply in warm, dry weather.

#### **USES**

- Use to kill weeds and grass growing in flower and vegetable gardens, near trees and shrubs, on sidewalks and driveways.
- Use for spot treatment of weeds in lawns.
- General contact herbicide which will kill or damage all vegetation that it contacts.

## STORAGE AND DISPOSAL

- Store at room temperature or cooler.
- Protect from freezing.
- Store only in original container.
- · Thoroughly rinse empty container and discard in trash.

## PRECAUTIONARY STATEMENTS

Superfast™ Brand ready-to-use

CAUTION: Harmful if swallowed. Avoid contamination of feed and foodstuffs. May cause eye irritation; avoid eve contact. In case of eye contact, flush eyes with plenty of water.

# RELATIVE TOXICITY RATINGS

- LD<sub>50</sub> is the industry standard for measuring acute toxicity of pesticide compounds. <u>Higher LD<sub>50</sub>'s are less</u> acutely toxic.
- Terminology
   LD = Lethal Dose
   50 = to kill 50% of population
   mg = milligrams of pesticide
   kg = kilograms body weight
- Example:
   An LD<sub>50</sub> of 300 means that 300
   milligrams of pesticide per kilogram of subject body weight will kill 50% of the exposed population (lab rats fed orally) immediately upon exposure.

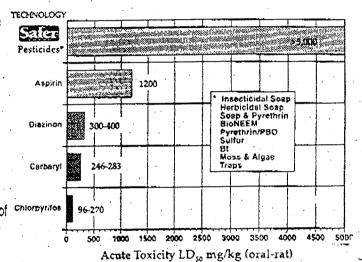


Chart
 In the chart you can see the listed Safer® products have LD<sub>50</sub>'s greater than 5000 compared to other compounds at less than 1200.

 Note: LD<sub>50</sub> is the most common measure of toxicity but only one of several criteria measuring toxicity of compounds.

#### SIGNAL WORD

- By law, one of four signal words must appear on every pesticide label to give the user some indication of the toxicity of the material.
- All pesticides are designed to kill/control pests and therefore must be used carefully according to individual product label directions.
- The four different rating levels are:
  - I. DANGER (LD<sub>50</sub> 0-50 mg/kg)
  - II. WARNING (LD<sub>50</sub> 50-500 mg/kg)
  - III. CAUTION (LD $_{50}$  500-1000 mg/kg)
  - IV. CAUTION (LD50 >5000 mg/kg)
- I. DANGER indicates the most toxic level and IV. CAUTION designates the lowest toxicity rating. The
  precautionary statements made at each level are mandatory and standard in their wording. Superfast™
  Brand Weed & Grass Killer ready-to-use falls into the IV. CAUTION category.

#### FIELD TESTING

- Over 100 field tests in U.S. and Canada for efficacy.
- Significant reduction of weed populations in treated plots in companion with untreated plots of annual broadleaf weeds 21 days after application.

	of the material of such arbstraces for confinen
This file is due back to us by:	Aug. 5, 1990
Name of Material: Soap-	based Herbicides
•	A JOHNSON RECEIVED JUL 3, 0, 1996
Is this substance Synthetic or no	- · · · · · · · · · · · · · · · · · · ·
appropriate) Synthetic - natural	by occurring plant and animal substances
If synthetic, how is the material made form is blank) but the process o	by occur, has plant and animal substances? (please answer here if our database the proprietary materials aren't clear.
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This material should be added to	the National List as:
Synthetic Allowed	Prohibited Natural
or, Non-synthetic (This material  Are there any use restrictions or placed on this material on the N	limitations that should be
Mon-food crops	ational Figt:
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Please comment on the accuracy of the	kiulotingrioù jiut tue fille: (1947) Jassaggas
Very accurate	
Any additional comments? (attach	iments welcomed)
dom la volt e l <b>e</b> porto de la secolo de	no este pomente un un professor par este este commentante de de la commentante de la commentante de la comment La commentante de la
Do you have a commercial interest in t	his material? Yes;/ No
Signature James a Johnson	Date 1/29/96

# Please address the 7 criteria in the Organic Foods Production Act: (comment in those areas you feel are applicable)

(1) the potential of such substances for detrimental chemical interactions with other materials used in organic farming systems; stable material, Flash point >200°F No Known materials that are incompatible.

- (2) the toxicity and mode of action of the substance and of its breakdown products or any contaminants, and their persistence and areas of concentration in the environment; LD50 > 5000, CAUTION whowen mode of action. It does not translocate in Plant, will not move through soil to injure nearby Plants. No hazardous decomposition Productsor polymenization.
  - (3) the probability of environmental contamination during manufacture, use, misuse or disposal of such substance; / , ...
  - (4) the effect of the substance on human health;

    Harnful if swallowed. May cause eye irritation. Chronic oral

    consumption of ethyl alcohol linked to birth defects and cancer in

    humans. Avoid contamination of feed and foodstuffs.

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- (5) the effects of the substance on biological and chemical interactions in the agroecosystem, including the physiological effects of the substance on soil organisms (including the salt index and solubility of the soil), crops and livestock; Avail Contamination of livestock feed and Godstuffs, will swely knock out vegetables as quickly as weeds!
- (6) the alternatives to using the substance in terms of practices or other available materials; and flaming weeds, cultivation, mulch-plant (ining & dead) and plastice crop rotation—hemp known to kill 95% of competitive weeds, buried drip irrigation, citrus oil, other botanicals, geese
- (7) its compatibility with a system of sustainable agriculture. My bias is to not use this material in everyday organic farming. It doesn't fit the philosophy. Perhaps in an economic emergency or transitional farmers just beginning the