



April 7, 2015

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket:** AMS-NOP-15-0002

**RE: Crops Subcommittee – 2017 Sunset Summaries for 206.601 and 205.602**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board on its 2017 Sunset Review process and the summaries posted for the spring 2015 meeting.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect the growth of organic trade to benefit the environment, farmers, the public and the economy.

OTA thanks NOSB for carefully considering each crop production input scheduled to sunset in 2017. It's critical that NOSB hear from certified farmers on whether these inputs are consistent with and necessary for organic production, or whether there are other effective natural or organic alternatives available.

To help facilitate a robust comment and review process, OTA created an electronic survey for each input under review for 2016 and 2017. The surveys are user-friendly, available to **every NOP certificate holder**, and include 7-10 questions addressing the necessity of the National List input under review. The name of the companies submitting the information is confidential (not disclosed to OTA). The goal is to collect information for NOSB to consider at the first stage of the two-step process to shape their recommendation, and again prior to the vote at the second meeting.

To ensure wide distribution of the surveys beyond OTA membership, OTA worked with Accredited Certifying Agencies (ACAs) to distribute the survey links to all of their certified clients as well as to targeted clients they know are using the inputs under review. We also worked through our Farmers Advisory Council (FAC<sup>1</sup>) to help assist us with distribution to NOP certified farmers. We hope these efforts will help NOSB in its review process.

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<sup>1</sup> OTA's Farmers Advisory Council was established in 2013 to formalize two-way communication between OTA and member producers as well as regional organic producer organizations across the United States. Through dialog and input, FAC gives organic farmers a voice to directly influence OTA's policy and provides an avenue for OTA to share information and advocacy work with this stakeholder group.

Given the short comment period, OTA left the surveys open beyond the comment deadline and we are still in the process of collecting information from certified farmers. We intend to deliver additional information in person at the meeting in La Jolla, CA.

**National List Criteria**

Materials that have been placed onto the National List for use in organic crop production should remain on the National List if: 1) they are consistent with organic farming; 2) they are still necessary to the production of the agricultural product because of the unavailability of wholly natural substitute products in organic production; and 3) no new information has been submitted demonstrating adverse impacts on humans or the environment (OFPA SEC. 2118 [7 U.S.C. 6517] National List). Furthermore decisions must be transparent, non-arbitrary, and based on the best current information and in the interest of the organic sector and public at-large.

Below is a summary of the feedback received via OTA’s sunset surveys to date. Please note that our surveys focus on the necessity of the essentiality of a National List input. We are not aware of or reporting on any new information regarding adverse impacts on humans and on the environment.

**Synthetic Substances Allowed for Use in Organic Crop Production (§ 205.601)**

Substance	Survey Information
Alcohols: Ethanol & Isopropanol	<p><b>Specific comments describing the use of this substance on organic farms:</b> For sanitizing hands and equipment to comply with food safety rules</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b> I can't think of any alternatives for hand sanitation; equipment could be sanitized with chlorine materials. I do not see that as any more environmentally friendly, however.</p>
Chlorine Materials (sodium hypochlorite, calcium hypochlorite, chlorine dioxide)	<p><b>Specific comments describing the use of this substance on organic farms:</b> Equipment and facility sanitation</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b> We use alcohol where we can; but various food safety requirements make this material necessary in a variety of circumstances.</p>
Hydrogen Peroxide	<p><b>Specific comments describing the use of this substance on organic farms:</b> This is the one disease control material that we can not do without. It is used to control bacterial blotch, cob web disease, verticillium disease, and others.</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b> For organic production there are no alternatives for this material. Conventional growers have many alternatives, including chlorine products and fungicides. This product has also become an important part of our food safety plans.</p>
Soab-based algicide/demossers	No survey responses
Herbicides, soap-based	No survey responses

Mulch – Newspaper or other recycled paper, without glossy or colored inks	No survey responses
Mulch – Plastic mulch and covers (petroleum-based other than polyvinyl chloride (PVC))	<p><b>Specific comments describing the use of this substance on organic farms:</b>          We always use black plastic mulch when we establish a vineyard. We do not irrigate and the black plastic mulch is critical to us getting the baby vines growing well over their first three years in the ground. We always take the black plastic up after it has been in for 4-5 years.</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b>          If we could not use black plastic mulch then we would have to invest heavily in irrigation.</p>
Soaps, ammonium	No survey responses
Ammonium Carbonate	No survey responses
Boric Acid	No survey responses
Elemental Sulfur	<p>Respondents to the survey represent 1,650 acres of certified organic crop land across the entire United States. Crops grown by these producers included citrus, cranberries, blueberries, wine grapes, pome fruit, stone fruit, feed grains, and the scales of operations ranged from 15 acres to 1,000 acres under certified organic management. All responses report using elemental sulfur products “routinely” or “occasionally” and rate elemental sulfur products as “critical” to the success of their operations.</p> <p><b>Specific comments describing the use of this substance on organic farms:</b>          Necessary to manage soil pH to create a favorable soil to cranberries that in addition aids in suppression of legume weeds          For organic blueberries as the only organic soil amendment available in high pH soil here.          Control mites          It is used to lower the pH of my soil to create a better environment for my blueberry plants.          It is used as a fungicide on fruit, primarily apples          Need to keep the pH of the blueberries in an acid state          To acidify alkaline soils          I use Kumulus DF or Microthiol Disperss every 10-days during the growing season from April through color change in early August. This spray is the foundation for my Powdery Mildew control.</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b>          Not many products available. Other are far too costly and ineffective. None Peat moss is one possible alternative. It would take significant more peat moss to lower</p>

	<p>pH to the extent sulfur can. We use many approaches to fungal diseases and sulfur is on option for us in situations that have high fungal disease pressure. Some weather conditions and fruits have more fungal pressure and sulfur is a limited but important part of our disease control Do not know what else to use There is no substitute available There really are none.</p>
Lime Sulfur – including calcium polysulfide	<p><b>Specific comments describing the use of this substance on organic farms:</b> Lime Sulfur is our "Dormant Spray" and we only use it once a year and it is a critical spray for us. It keeps the Willamette Mites off our vineyard and also helps kill off any over-wintering mildew spores.</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b> There are none</p>
Oils, Horticultural – narrow range oils as dormant, suffocating, and summer oils	<p>Respondents to the survey represent 550 acres of certified organic crop land in the Southwestern United States and Mid-Atlantic Region. Crops grown by these producers include blueberries and citrus. All responses report using horticultural oil products “routinely” or “occasionally” and rate horticultural oil products as “critical” to the success of their operations.</p> <p><b>Specific comments describing the use of this substance on organic farms:</b> Organic oils on 25b exempt list. It is necessary for our formula of pest control. Used to control mites and thrip insects that cause damage to lemons</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b> Availability is slim Not aware of any alternatives</p>
Soaps, insecticidal	<p>Respondents to the survey represent 320 acres of certified organic crop land in the Southwestern United States. Crops grown by these producers include citrus. All responses report using insecticidal soap products “routinely” and rate insecticidal soap products as “critical” to the success of their operations.</p> <p><b>Specific comments describing the use of this substance on organic farms:</b> Controls insects, mites, thrips</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b> Not aware of any alternatives. Would have to farm conventionally.</p>
Sticky traps/barriers	No survey responses
Sucrose Octanoate Esters (CAS #s— 42922-74-7; 58064-47-4)	No survey responses
Pheromones	No survey responses
Vitamin D3	<p><b>Specific comments describing the use of this substance on organic farms:</b> We use this in external bait stations-not in our facilities. We use only mechanical traps where there is any possibility of contact with our crop; but as we are in a populated area with a lot of surrounding residential, light industry, and agriculture; rats can be a problem.</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b></p>

	There are very few alternatives to this material in an organic operation and none that we would feel comfortable using.
Copper Sulfate & Coppers, fixed—copper hydroxide, copper oxide, copper oxychloride	No survey responses
Hydrated Lime	<p><b>Specific comments describing the use of this substance on organic farms:</b> This is used almost universally in mushroom casing for disease control. It is important to raise the pH of the casing material into a range that makes it less vulnerable to weed molds such as Trichoderma. Other pH adjusters require much larger quantities to do the same job and change the structure and texture of the casing material so that it is not suitable for production.</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b> There are no viable alternatives that I know of. As mentioned above, it is possible to adjust the pH with other materials, but doing so changes the nature of the casing material. This material has been used this way for many decades and it would be hard to find a better way.</p>
Potassium Bicarbonate	No survey responses
Aquatic Plant Extracts	No survey responses
Humic Acids	<p>Respondents to the survey represent 40 acres of certified organic crop land in the Western and Mid-Western United States. Crops grown by these producers include vegetables, berries, tree fruit, and mushrooms. All responses report using humic acid products “routinely” and rate humic acid products as “critical” to the success of their operations.</p> <p><b>Specific comments describing the use of this substance on organic farms:</b> Increases the efficiency of soil inputs used for fertility, improves microbial activity, detoxifies toxic substances such as arsenic, mercury, etc. It is used as a supplement in various [mushroom] substrates As good organic based plant soil health product</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b> There are no alternatives I know of no alternatives for this particular usage Compost teas, difficult to make and apply</p>
Lignin Sulfonate—chelating agent, dust suppressant	<p><b>Specific comments describing the use of this substance on organic farms:</b> We spray it on our high-traffic tractor roads around our vineyard to keep the dust down during our very dry summers here in western Oregon. Dust in the vine canopy is not a good thing so we need to use something for dust control. We use calcium lignin sulfonate as a binder or chelating agent for our organic fertilizer manufacturing process. The calcium lignin sulfonate greatly helps us granulate our organic fertilizer materials. Without this product, we would not be able to manufacture a high nitrogen organic fertilizer for growers who greatly need this type of fertilizer.</p>

	<p><b>Specific comments regarding the availability and efficacy of alternatives:</b>          I don't know of any alternatives that are organic          We do not know a viable alternative at this time.</p>
Magnesium Sulfate	No survey Responses
Micronutrients – Soluble boron products, sulfates, carbonates, oxides, or silicates of zinc, copper, iron manganese, molybdenum, selenium, and cobalt	<p>Respondents to the survey represent 300 acres of certified organic crop land in the Western United States. Crops grown by these producers include rice, vegetables and tree fruit, and the scales of operations ranged from 2 acres to 300 acres under certified organic management. Responses report using micronutrient products “seldom” or “routinely” and rate micronutrient products as “critical” to the success of their operations.</p> <p><b>Specific comments describing the use of this substance on organic farms:</b>          Boron. We have low boron and it is necessary for calcium to be utilized properly.          Copper sulfate</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b>          I have not found alternatives          None</p>
Liquid Fish Products	<p>Respondents to the survey represent 6,700 acres of certified organic crop land across the entire United States. Crops grown by these producers ranged from forage and feed grains to specialty crops including nuts, fruits, vegetables, and the scales of operations ranged from ¼ acres to over 1,000 acres under certified organic management. The vast majority of responses report using liquid fish products “routinely” and rate liquid fish products as either “more necessary” or “critical” to the success of their operations.</p> <p><b>Specific comments describing the use of this substance on organic farms:</b>          We use whole fish hydrolysate. It builds the soil and provides lots of trace minerals-sulfur, zinc, and copper plus lipids and other items.          foliar spray, improve soil and plant health          Used as fertigation through my irrigation system. Liquids are utilized through the soil faster and more efficiently which leads to increase proficiency. The cost of equipment has been and investment. It provides needed micronutrients that improve soil biology and root systems. There are very limited organic liquid fertilizers available on the market and with fertigation that is important.          My trees struggle in clay soil. brings vigor to the trees which helps them produce a crop. Will not use anything else. Nothing works as great as the fish fertilizer. Tried many other products.          1-foliar feeding of greenhouse starts for transplanting 2- added to dripline irrigation in tomatoes and peppers grown in a greenhouse to supplement cover crop and soil incorporated fertilizer          We are using Damm Liquid Fish fertilizer on our black currants, applied as a foliar spray three times during the growing season. We hope to not only provides nutrients for our currant plants and improve the Brix in the fruit, but to also improve the health of the soil microbiome          We apply emulsified fish in furrow at planting in our row crops, and as a foliar</p>

fertilizer on small grains, hay. Emulsified fish provides an economical source of essential nutrients for delicious and nutritious certified organic food. I rarely use it. I do not agree with the approved uses of synthetics in organic inputs. foliar feeding, soil application it is very good for soil biology for healthier plants and better fruit. Improved plant health which suppresses disease and insects  
 Our hay crop is sprayed 2 times a year with outstanding results sweetest smelling hay around with very healthy cows and horses  
 We apply it foliarly. It improves crop yield and reduces both insect and disease pressure  
 We use it through fertigation, after conducting soil tests and plant tissue analysis. We especially depend on it to tweak fertility for our more valuable and finicky crops, like tomatoes, strawberries, raspberries, and high tunnel crops. In cold soil this substance is more available to our crops than compost or manure inputs, which is invaluable to us  
 Seedling Soil Life Enhancer Seedling Fertilizer Level Stabilizer Foliar Feed Emergency Fast Acting Crop Nitrogen Supplement Why? It is needed for stabilizing nutrition in the small 4" pot soil volume at seedling growth stage. It enhances diversity of life, and more varied inputs make more varied soil life. It fills the need for a liquid organic fertilizer Foliar feeding enhances foliar life, thus suppressing foliar diseases

**Specific comments regarding the availability and efficacy of alternatives:**

What alternative?

There are few if any available alternatives to liquid fish fertilizers that provide the necessary benefits. If unavailable I would be forced to make my own liquid fish "tea".

There is nothing we can use that delivers as much nitrogen for so little cost that the plants use totally and fully.

I used to purchase other products, but those companies had either dissolved or stopped carrying those products. I know the local Dist Rep, so the whole process has been very convenient

Very few alternatives, Liquid form means less product to get desired results

Most chemicals used today kill or harm the necessary biology that uses the carbon or humus to feed the plants.

Not aware of any alternatives

There is none

There are few alternatives for emulsified fish. These alternative fertilizers are more expensive and they are not as effective.

I think fish products are beneficial addition in organic crop production, but I do not understand how the NOP can allow the use of synthetics to stabilize this product and still consider this an organic product. There are citric acid products available, and other methods can be used to stabilized the fish product without the use of synthetics.

There are few if any equivalent alternatives to liquid fish fertilizer. Where nutrient equivalents exist, they are not economically viable due to their high cost

No equivalents that supply so much.

	<p>I do fine without          Not aware of anything that would be equivalent          Fewer and fewer products like this are available.          None          It is the only liquid nitrogen rich fertilizer available.          Have not found any organic fertilizer that can compare to the results at near the cost where I'm located at.          There are few if any equivalent alternatives to liquid fish fertilizer. Equivalent products are typically cost prohibitive.          We do not have a comparable product.          I am not aware of equivalent alternative products.          I am not aware of good alternatives in liquid form that have the benefits of liquid fish. Liquid products have so much more flexibility in application.          We generally use dry fertilizer because it is less expensive Other liquid organic fertilizers are similarly or more expensively priced and typically more "manufactured."          I don't know of any          Rotted compost/aged manure. Time consuming. Expensive. Doesn't work like fish in the spring.          Limited/Unstable          I'm not aware of alternative products with the same benefits          There are no alternatives supplying the same level of benefits.          I don't know of any.          I could use soil amendments but it is good to have if I notice that the garlic has some nutritional problems after it is already planted.</p>
Vitamins, B1, C, and E	No survey responses
Compost Feedstocks: Newspapers or other recycled paper, without glossy or colored inks	<p><b>Specific comments describing the use of this substance on organic farms:</b>          Shredded paper is used to make my fungal based compost. I compost a lot of grass clippings and need a large base of carbon materials to keep my compost fungal based</p> <p><b>Specific comments regarding the availability and efficacy of alternatives:</b>          Do not have enough "brown " materials when i have a lot of grass clippings to compost</p>
Plant Growth Regulators: Ethylene gas—for regulation of pineapple flowering	No survey responses
Floating Agents in Postharvest Handling: Lignin Sulfonate	No survey responses
Floating Agents in Postharvest Handling: Sodium	No survey responses

Silicate	
Microcrystalline cheesewax-for use in log grown mushroom production	No survey responses
EPA List 4 Inert Ingredients	No survey responses

In closing, we thank the Board for its time and commitment. OTA is committed to collecting information from our broad membership and beyond in order to assist NOSB in determining whether or not a substance on the National List remains necessary in organic crop production.

Again, on behalf of our members across the supply chain and the country, OTA thanks NOSB for the opportunity to comment and for your commitment to furthering organic agriculture.

Respectfully submitted,



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 Organic Trade Association

cc: Laura Batcha  
 Executive Director / CEO  
 Organic Trade Association