ORGANIC TRADE ASSOCIATION

2028 Crop Sunset Materials (2026 Review)

Unanimous vote to renew
Majority vote to renew (10-14 votes)
Significant to remove (9 votes and below) / Vote to remove (4 votes and below)

Copper sulfate | §205.601(a) for use as an algicide in aquatic rice systems, is limited to one application per field during any 24-month period. Application rates are limited to those which do not increase baseline soil test values for copper over a timeframe agreed upon by the producer and accredited certifying agent; and,

§205.601(e) for use as tadpole shrimp control in aquatic rice production, is limited to one application per field during any 24-month period. Application rates are limited to levels which do not increase baseline soil test values for copper over a timeframe agreed upon by the producer and accredited certifying agent.

- **Uses in organic crop production:** Used as an algicide and to control tadpole shrimp in aquatic rice systems.
- **OTA Position:** Copper sulfate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.
- **Public comments from last sunset review:** The majority of comments supported relisting, with some calling for stronger efforts to identify alternatives.
- **Board vote at last sunset review:** **Majority vote to renew**
- **Subcommittee questions:**

1. How do certifiers verify compliance with this annotation?
2. Are there practical alternatives for algae and tadpole shrimp management in paddy rice?
3. Are there practical methods to remediate high soil copper levels?
4. What are common organic rice rotations? Is rice ever grown in successive years?
5. If so, is copper sulfate allowed to be applied to rice in successive years, alternating control of algae and tadpole shrimp?

Chlorine Materials (Calcium hypochlorite, Chlorine dioxide, Hypochlorous acid - generated from electrolyzed water, Sodium hypochlorite) | §205.601(a) As algicide, disinfectants, and sanitizer, including irrigation system cleaning systems. (2) For pre-harvest use, residual chlorine levels in the water in direct crop contact or as water from cleaning irrigation systems applied to soil must not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act, except that chlorine products may be used in edible sprout production according to EPA label directions.

- **Uses in organic crop production:** Used as antimicrobial disinfectants and pesticides used to control harmful microorganisms including bacteria, viruses, and fungi on food contact surfaces.
- **OTA Position:** Chlorine materials currently meet the criteria for continued listing: used according to label directions they do not appear to be harmful to human health or the environment, they are necessary for organic production, there are no viable alternatives, and they are consistent with organic crop production.
- **Public comments from last sunset review:** Comments widely supported relisting, noting this class of materials is essential to ensure food safety compliance with food safety regulations under the Food Safety Modernization Act (FSMA).
- **Board vote at last sunset review:** **Unanimous vote to renew all four chlorine materials**
- **Subcommittee questions:** None

Ozone gas | §205.601(a) for use as an irrigation system cleaner only.

- **Uses in organic crop production:** Used as irrigation system cleaner.
- **OTA Position:** Ozone gas currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.
- **Public comments from last sunset review:** All comments supported relisting.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:**

1. Is ozone gas necessary for organic crop production, and for what specific uses (e.g., water sanitation, post-harvest handling, equipment sanitation)?
2. Are there effective organic alternatives available that could reasonably replace ozone for these uses?

Peracetic acid | §205.601(a) for use in disinfecting equipment, seed, and asexually propagated planting material. Also permitted in hydrogen peroxide formulations as allowed in §205.601(a) at concentration of no more than 6% as indicated on the pesticide product label; and,

§205.601(i)(8) for use to control fire blight bacteria. Also permitted in hydrogen peroxide formulations as allowed in §205.601(i) at concentration of no more than 6% as indicated on the pesticide product label.

- **Uses in organic crop production:** Used to disinfect equipment and seed; as an ingredient in hydrogen peroxide formulations where allowed.
- **OTA Position:** Peracetic acid currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.
- **Public comments from last sunset review:** Comments widely supported relisting.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- Subcommittee questions: None

Magnesium oxide | §205.601 for use only to control the viscosity of a clay suspension agent for humates.

- **Uses in organic crop production:** Used to control the viscosity of a clay suspension agent for humates.
- **OTA Position:** Magnesium oxide currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.
- **Public comments from last sunset review:** Comments supported relisting.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:**

1. Are there any commercially available nonsynthetic or less-processed alternatives that can perform the same viscosity-control function for liquid humates as magnesium oxide? If so, please describe their availability, performance, and limitations.
2. Is magnesium oxide still necessary for its currently approved use in organic crop production?

EPA List 3 Inerts | §205.601 for use only in passive pheromone dispensers.

- **Uses in organic crop production:** Used in passive pheromone dispensers to trap or disrupt pest insect populations.
- **OTA Position:** OTA has commented extensively on this listing, which references a list no longer maintained by EPA. OTA recognizes the need to determine a solution that allows inert ingredients in pest control products that are vital to organic operations, meet OFPA criteria, and allow for the development of new products to meet the needs of organic operations. OTA generally supports the recommended rulemaking options voted on at the October 2024 NOSB meeting and looks forward to further work on this from the NOP.
- Until there is an alternative to this listing, OTA supports the continued listing to ensure organic operations have the tools essential to their success.
- **Public comments from last sunset review:** Comments generally supported relisting, with many pointing to the need for an updated listing to more specifically list the ingredients represented by this broader, outdated listing.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:** None

Calcium Chloride | §205.602 brine process is natural and prohibited for use except as a foliar spray to treat a physiological disorder associated with calcium uptake.

- **Uses in organic crop production:** Prohibited except for use in managing physiological disorders on crops via foliar application to treat calcium uptake disorders due to local deficiencies.
- **OTA Position:** Calcium chloride currently meets the criteria for continued prohibited listing: except for its limited allowance, it is a highly soluble material that is not consistent with organic crop production.
- **Public comments from last sunset review:** Comments supported the limited use restriction under the current listing.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:** None

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Rotenone | §205.602 (CAS # 83-79-4)

- **Uses in organic crop production:** Prohibited for use in organic. Used as a broad-spectrum botanical pesticide elsewhere in the world, it is labeled in the U.S. for use only as a piscicide (fish killing).
- **OTA Position:** OTA supports the continued prohibition of rotenone in organic production.
- **Public comments from last sunset review:** Comments supported relisting as a prohibited substance.
- **Board vote at last sunset review:** **Unanimous vote to renew prohibition**
- **Subcommittee questions:** None