ORGANIC TRADE ASSOCIATION

May 4, 2026

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP

Docket: AMS-NOP-25-0914

RE: Crops Subcommittee
2028 Sunset Crops Substances

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Crops Subcommittee on its 2028 Sunset Crops Substances. 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. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

Each year, OTA conducts surveys of the trade to inform our position on the current year review of National List substances. Surveys are posted online and include a brief description of uses in organic production; the OTA draft position; a brief summary of public comments from the last sunset review; an indication of the Board's vote at last sunset review (unanimous vote to renew, majority vote to renew, or significant vote to remove); and any questions posed by the Subcommittee. Respondents are asked to provide any additional information related to the material, its usage, and compliance with National List criteria, including whether the material should remain listed.

Based on those surveys, OTA provides the following comments on the 2028 Sunset Crops Substances:

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.

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.

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.

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.

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.

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.

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, due to availability of alternative calcium products and the probability of environmental contamination form use or misuse outside of the limited allowance.

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 due to its adverse environmental and health impacts.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,

Scott Rice
Sr. Director, Regulatory Affairs
Organic Trade Association

cc: Tom Chapman
Co-CEO
Organic Trade Association