



April 21, 2025

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

Docket: AMS-NOP-24-0081

**RE: Crops Subcommittee
2027 Sunset Crops Substances**

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Crops Subcommittee on its 2027 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. For agricultural materials, we ask for any information regarding the availability or history of unavailability in the appropriate form, quality, or quantity of the material as well as any new information on alternative substances.

Based on those surveys, OTA provides the following comments on the 2027 Sunset Crops Substances:

Potassium hypochlorite | §205.601(a)(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.

(iv) for use in water for irrigation purposes.

- **Uses in organic crop production:** Used as cleaner for irrigation systems.

- **OTA Position:** Potassium hypochlorite 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.

Soap-based algicide/demossers | §205.601—for use as bait in insect traps only, no direct contact with crop or soil.

- **Uses in organic crop production:** Used to control algae and moss build-up on irrigation systems.
- **OTA Position:** Soap-based algicide/demossers currently meet the criteria for continued listing: 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.

Ammonium carbonate | §205.601—for use as bait in insect traps only, no direct contact with crop or soil.

- **Uses in organic crop production:** Used for bait in insect traps.
- **OTA Position:** Ammonium carbonate 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.

Soaps, insecticidal | §205.601—As insecticides (including acaricides or mite control).

- **Uses in organic crop production:** Used for control of hard- and soft-bodied pest insects in the larval stage.
- **OTA Position:** Insecticidal soaps currently meet the criteria for continued listing: 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.

Sucrose octonate esters | §205.601 (CAS #s—42922-74-7; 58064-47-4)—in accordance with approved labeling.

- **Uses in organic crop production:** Used to control soft-bodied pest organisms including mites, aphids, and whiteflies.
- **OTA Position:** Given the Board's recommendation to remove this listing in its last review, OTA is interested in hearing from members if there is a need for this substance, and whether the EPA-registered products containing this substance are in use by organic producers.

Vitamin D3 | §205.601—as rodenticides.

- **Uses in organic crop production:** Used for rodent control.
- **OTA Position:** Vitamin D3 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.

Aquatic plant extracts | §205.601 (other than hydrolyzed) – Extraction process is limited to the use of potassium hydroxide or sodium hydroxide; solvent amount is limited to that amount necessary for extraction.

- **Uses in organic crop production:** Used as a fertilizer and soil amendment.
- **OTA Position:** Aquatic plant extracts currently meet the criteria for continued listing: 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.

Lignin sulfonate | §205.601—chelating agent, dust suppressant.

- **Uses in organic crop production:** Used as a chelating agent and dust suppressant.
- **OTA Position:** Lignin sulfonate 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.

Fatty alcohols | §205.601 (C6, C8, C10, and/or C12)—for sucker control in organic tobacco production.

- **Uses in organic crop production:** used to kill or inhibit sucker growth in tobacco plants, which facilitates growth of harvestable leaves, reduces pest pressure, increases crop yields and contributes to farmworker safety in reducing exposure to potential health impacts of manual desuckering.
- **OTA Position:** Fatty alcohols currently meet the criteria for continued listing: 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.

Sodium silicate | §205.601—As floating agents in postharvest handling. Sodium silicate—for tree fruit and fiber processing.

- **Uses in organic crop production:** Used as a floating agent in postharvest handling of tree fruit and fiber.

- **OTA Position:** Sodium silicate 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 4 Inerts | §205.601 As synthetic inert ingredients as classified by the Environmental Protection Agency (EPA), for use with nonsynthetic substances or synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances. (1) EPA List 4—Inerts of Minimal Concern.

- **Uses in organic crop production:** Used as inactive ingredients formulated with allowed pesticide active ingredients.
- **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.

Paper | §205.601—production aids; paper-based crop planting aids

- **Uses in organic crop production:** Used as a crop production aid in pots, seed tape, and collars that are placed directly into the soil.
- **OTA Position:** Paper 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.

Arsenic | §205.602

- **Uses in organic crop production:** Prohibited for use in organic production. Used in the production of pesticide treated wood products, herbicides, and insecticides for applications in conventional production.
- **OTA Position:** OTA supports the continued prohibition of arsenic in organic production.



Strychnine | §205.602

- **Uses in organic crop production:** Prohibited for use in organic production. Strychnine is a toxic alkaloid allowed in conventional agriculture for below-ground use to control pocket gophers.
- **OTA Position:** OTA supports the continued prohibition of strychnine in organic production.

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,

A handwritten signature in black ink, appearing to read "Scott Rice", is positioned above the printed name.

Scott Rice
Sr. Director, Regulatory Affairs
Organic Trade Association

cc: Tom Chapman
Co-CEO
Organic Trade Association