ORGANIC TRADE ASSOCIATION

May 4, 2026

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

Docket: AMS-NOP-25-0914

RE: Handling Subcommittee
2028 Sunset Handling Substances

Dear Ms. Arsenault:

Thank you for this opportunity to provide feedback to the Handling Subcommittee on its 2028 Sunset Handling 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 Handling Substances:

Carrageenan | §205.605(a)

- **Uses in organic processing/handling:** Used as an emulsifier, thickener, and gelling agent with specific use as a vegan alternative to gelatin.
- **OTA Position:** Carrageenan currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

Agar-agar | §205.605(a)

- **Uses in organic processing/handling:** Used as a thickener, gelling agent, emulsifier, absorbent and other applications.
- **OTA position:** Agar-agar currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

Animal enzymes | §205.605(a) Rennet - animals derived; Catalase - bovine liver; Animal lipase; Pancreatin; Pepsin; and Trypsin.

- **Uses in organic processing/handling:** Used to coagulate or curdle milk for production cheese or sour cream.
- **OTA position:** Animal enzymes currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, are necessary for organic production, there are no viable alternatives, and they are consistent with organic handling.

Calcium sulfate - mined | §205.605(a)

- **Uses in organic processing/handling:** Used as a coagulant in the production of tofu, as a yeast food and dough conditioner, to adjust the mineral content of water, as a firming agent, and as a gelling agent.
- **OTA Position:** Calcium sulfate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

Glucono delta-lactone | §205.605(a) production by the oxidation of D-glucose with bromine water is prohibited.

- **Uses in organic processing/handling:** Used primarily as a coagulant in the production of silken tofu, and as a pickling agent, leavening agent, for pH control, and as a sequestrant.
- **OTA Position:** Glucono delta-lactone 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 it is consistent with organic handling.

Tartaric acid | §205.605(a) made from grape wine

- **Uses in organic processing/handling:** Used in a wide variety of products as an acidulant, pH control agent, chelating agent, stabilizer, anti-caking agent, and firming agent.
- **OTA Position:** Tartaric acid currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

Cellulose | §205.605(b)

- **Uses in organic processing/handling:** Used as processing aid for filtration of juices, as an anti-caking agent for shredded cheese, and as a casing for hot dogs and sausages.
- **OTA Position:** Cellulose currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

Chlorine materials (Calcium hypochlorite, Chlorine dioxide, Hypochlorous acid – generated from electrolyzed water, Sodium hypochlorite) | §205.605(b) disinfecting and sanitizing food contact surfaces, equipment and facilities may be used up to maximum labeled rates. Chlorine materials in water used in direct crop or food contact are permitted at levels approved by the FDA or EPA for such purpose, provided the use is followed by a rinse with potable water at or below the maximum residual disinfectant limit for the chlorine material under the Safe Drinking Water Act. Chlorine in water used as an ingredient in organic food handling must not exceed the maximum residual disinfectant limit for the chlorine material under the Safe Drinking Water Act.

- **Uses in organic processing/handling:** Used as antimicrobial disinfectants and pesticides used to control harmful microorganisms including bacteria, viruses, and fungi in facilities and on equipment.
- **OTA Position:** Chlorine materials currently meet the criteria for continued listing: when 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 handling.

Potassium hydroxide | §205.605(b) prohibited for use in lye peeling of fruits and vegetables except when used for peeling peaches.

- **Uses in organic processing/handling:** Used as pH adjuster, cleaning agent, stabilizer, thickener, and poultry scald agent.

- **OTA Position:** Potassium hydroxide currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

Potassium lactate | §205.605(b) for use as an antimicrobial agent and pH regulator only.

- **Uses in organic processing/handling:** Used as an antimicrobial when added to meat and a pH adjustor.
- **OTA Position:** Potassium lactate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

Silicon dioxide | §205.605(b) Permitted as a defoamer. Allowed for other uses when organic rice hulls are not commercially available.

- **Uses in organic processing/handling:** Used as an anticaking agent, a stabilizer in beer production, as a carrier, and as a defoaming agent.
- **OTA Position:** Silicon dioxide currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

Sodium lactate | §205.605(b) for use as an antimicrobial agent and pH regulator only.

- **Uses in organic processing/handling:** Used as an antimicrobial when added to meat and a pH adjustor.
- **OTA Position:** Sodium lactate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic handling.

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,

ORGANIC TRADE ASSOCIATION

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Organic Trade Association

cc: Tom Chapman
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Organic Trade Association