



May 4, 2026

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

Docket: AMS-NOP-25-0914

**RE: Livestock Subcommittee
 2028 Sunset Livestock Substances**

Dear Ms. Arsenault:

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

Activated Charcoal | §205.603(a) (CAS # 7440-44-0)—must be from vegetative sources.

- **Uses in organic livestock production:** Used as an antidote to ingestion of toxic substances.
- **OTA Position:** Activated charcoal 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 livestock production.

Calcium borogluconate | §205.603(a) (CAS # 5743-34-0)—for treatment of milk fever only.

- **Uses in organic livestock production:** Used for treatment of hypocalcemia (milk fever) in cattle, sheep, and goats.
- **OTA Position:** Calcium borogluconate 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 livestock production.

Calcium propionate | §205.603(a) (CAS # 4075-81-4)—for treatment of milk fever only.

- **Uses in organic livestock production:** Used for treatment of hypocalcemia (milk fever) in cattle, sheep, and goats.
- **OTA Position:** Calcium propionate 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 livestock production.

Chlorine materials (Calcium hypochlorite, Chlorine dioxide, Hypochlorous acid – generated from electrolyzed water, Sodium hypochlorite) | §205.603(a) As disinfectants, sanitizer, and medical treatments as applicable. (10) disinfecting and sanitizing facilities and equipment. Residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.

- **Uses in organic livestock production:** 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: 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 livestock production.

Kaolin pectin | §205.603(a) for use as an adsorbent, antidiarrheal, and gut protectant.

- **Uses in organic livestock production:** Used as an adsorbent, antidiarrheal, and gut protectant.
- **OTA Position:** Kaolin pectin 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 livestock production.

Mineral oil | §205.603(a) for treatment of intestinal compaction, prohibited for use as a dust suppressant.

- **Uses in organic livestock production:** Used as a treatment for intestinal compaction.
- **OTA Position:** Mineral oil 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 livestock production.

Nutritive supplements | §205.603(a) injectable supplements of trace minerals per paragraph (d)(2) of this section, vitamins per paragraph (d)(3), and electrolytes per paragraph (a)(11), with excipients per paragraph (f), in accordance with FDA and restricted to use by or on the order of a licensed veterinarian.

- **Uses in organic livestock production:** Used to treat ailments, support animals' immune systems, and contribute to animal welfare when administered or ordered by licensed veterinarian.
- **OTA Position:** Nutritive supplements 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 livestock production.

Propylene glycol | §205.603(a) (CAS #57-55-6)—only for treatment of ketosis in ruminants.

- **Uses in organic livestock production:** Used in ruminants as a treatment for ketosis, a metabolic disease resulting from an energy imbalance in early lactation.
- **OTA Position:** Propylene glycol 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, it is consistent with organic livestock production, and while there are some alternatives available, they do not meet the efficiency and availability of propylene glycol.

Sodium chlorite, acidified | §205.603(a), (b) allowed for use on organic livestock as a teat dip treatment only.

- **Uses in organic livestock production:** Used as a disinfecting teat dip to prevent mastitis
- **OTA Position:** Acidified sodium chlorite 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 livestock production.



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Zinc sulfate | §205.603(b) for use in hoof and foot treatments only.

- **Uses in organic livestock production:** For use as a footbath for control of foot rot in livestock and offers an alternative to copper compounds, which are toxic to sheep and goats.
- **OTA Position:** Zinc 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 it is consistent with organic livestock 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,

Scott Rice
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Organic Trade Association

cc: Tom Chapman
Co-CEO
Organic Trade Association