



April 7, 2015

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-15-0002

RE: Crops Subcommittee – Petitioned Materials: Exhaust Gas, Calcium Sulfate, and 3-decen-2-one

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board and the Crops Subcommittee (CS) on its proposals regarding petitions to add exhaust gas, calcium sulfate, and 3-decen-2-one to National List of synthetic substances allowed for use in organic crop production.

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, representing organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect the growth of organic trade to benefit the environment, farmers, the public and the economy.

OTA thanks NOSB for its exhaustive review of these substances against the criteria for inclusion on the National List: 1) 1) they are consistent with organic farming; 2) they are still necessary to the production of the agricultural product because of the unavailability of wholly natural substitute products with organic production; and 3) no new information has been submitted demonstrating adverse impacts on humans or the environment (OFPA SEC. 2118 [7 U.S.C. 6517] National List).

We agree with the CS recommendations to **NOT ADD** exhaust gas, calcium sulfate or 3-decen-2-one to the National List because they fail to meet all National List criteria. There are natural or currently allowed synthetic alternatives for all three of these substances:

- Vitamin D3 (rodenticide and allowed alternative for exhaust gas)
- Mined Gypsum (soil amendment and natural alternative to calcium sulfate)
- Clove Oil (potato sprout inhibitor and natural alternative to 3-decen-2-one)

Additionally, the information contained in the Technical Reviews for these three substances indicate that they fail either the necessity or human and environmental health criteria, or both. As a result of these assessments, we concur with the CS' recommendation and urge NOSB to **NOT ADD** these substances to the National List for use in organic crop production and post-harvest handling.



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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nathaniel Lewis", is written over a light gray circular watermark that contains the text "Nathaniel Lewis".

Nathaniel Lewis
Senior Crops and Livestock Specialist
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association