March 30, 2017

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2642-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-16-0100

RE: Crops and Livestock Subcommittees – 2019 Sunset Survey Summaries for 205.601 (Synthetic Substances Allowed for Use in Organic Crop Production) and 205.603 (Synthetic Substances Allowed for Use in Organic Livestock Production)

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board (NOSB) on its 2019 Sunset Review process.

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 over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA thanks NOSB for carefully considering each crop and livestock input scheduled to sunset in 2019. It's critical that NOSB hear from certified producers on whether these inputs are consistent with and necessary for organic production, or whether there are other effective natural or organic alternatives available.

OTA is submitting the first round of the results to our electronic surveys that were created for each input under review for 2019. The surveys were created and made available to **every NOP certificate holder** and include 7-10 questions addressing the **necessity (farm and livestock) or essentiality (handling)** of the National List input under review. The names of the companies submitting the information are confidential (not disclosed to OTA). To ensure wide distribution of the surveys beyond OTA membership, OTA worked with Accredited Certifying Agencies (ACAs) and OMRI to distribute the survey links to all of their clients as well as to targeted clients they know are using the inputs under review. OTA also worked through its Farmers Advisory Council (FAC[1]) to help assist in distribution to NOP certified farmers.

[1] OTA's Farmers Advisory Council was established in 2013 to formalize two-way communication between OTA and member producers as well as regional organic producer organizations across the United States. Through dialog and input, FAC gives organic farmers a voice to directly influence OTA's policy and provides an avenue for OTA to share information and advocacy work with this stakeholder group.

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The comments submitted at this time include everything we have received through March 30, 2017. We have received the following total responses:

- 205.601 Allowed Synthetic Crop Inputs: 19
- 205.603 Allowed Synthetic Livestock Inputs: 5
- **Total: 24**

National List Criteria
Materials that have been placed onto the National List for use in handling should remain on the National List if: 1) they are still necessary and compatible with organic production and handling practices; 2) there are no commercially available alternative materials (natural, organic) or practices; and 3) no new information has been submitted demonstrating adverse impacts on humans or the environment (OFPA SEC. 2118 [7 U.S.C. 6517 and 6518] National List). Furthermore decisions must be transparent, non-arbitrary, and based on the best current information and in the interest of the organic sector and public at-large.

Based on survey results and/or feedback received directly by members, the following materials meet the necessity criteria listed above. The sunset materials under review that are not listed below did not receive any survey responses. The lack of feedback, however, does not necessarily mean the substance is not being used. We are continuing to work in improving our ability to reach every operator. Our comments focus on the necessity and essentiality. We are not aware of any new information on adverse impacts on humans and on the environment.

Synthetic Substances Allowed for Use in Organic Crop Production (§ 205.601)

Substance	Survey Information
Copper Sulfate and Fixed Copper	**Producer Comment**: Copper is the only chemical that is approved to stop leaf curl in Stone Fruits **Producer Comment**: Copper sulfate is used as fungicide against Fusarium Solani and Botrytis. Copper is involved with carbohydrate and nitrogen metabolism. It is also linked to chlorophyll performance. Copper sulfate is used as fertilizer when a deficiency is documented. Other products based on peroxide hydrogen and natural ingredients as Bacillus subtilis are not as effective in disease control treatment as Copper Sulfate is. As fertilizer, Copper sulfate has a faster dispose by the plant than other products copper based. **Producer Comment**: Downey mildew is an especially pervasive problem, which threatens our organic spinach production. Fixed copper is one of the few (if not the only) tools we can use to combat difficult diseases like downy mildew and bacterial leaf spot. We continuously evaluate other organic-compliant alternatives, but none of these materials are as effective as copper is.

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Humic Acids	**Producer Comment**: Humic acids are some of the building blocks of the soil food web. Without them, farming organically would be all but impossible. There is absolutely nothing that can truly replace Humic acids! Without this Organic farming's future would be in jeopardy **Producer Comment**: We add them to irrigation water to increase the availability of nutrient elements to the plants and also it is included in our compost tea process for promoting the growth of microbiological organisms. There no other alternatives at this moment. **Producer Comment**: Humic acid helps breakdown the nitrogen in substrate and protects plants from salts. Helps in bacteria break down. No alternatives
Sticky Traps/Barriers	**Producer Comment:** Sticky Traps are vital in our organic operation. They are a big part of our success in the pest control program. We use Sticky Traps as follow: 1. Sticky traps are placed in all crop production areas to massively catch white flies, trips and aphids. 2. To catch pest (white flies, trips and aphids) manually. 3. To monitor pest populations and determinate if an allowed input for pest control is necessary. To increase use of allowed inputs for pest control and beneficial insects are the alternatives. **Producer Comment:** Helps me assess the level of insect pressure on the farm and where I have trouble spots **Producer Comment:** Sticky traps are important tools in our integrated pest management program. When preventative, mechanical, and physical measures fail to prevent pests, sticky traps and barriers are sometimes necessary to prevent insects and other pests from damaging our crops. As an organic grower, we're limited in the organic-compliant tools, which are available to us. Part of good integrated pest management program is using a wide array of materials and tools depending on the crop, soil, and environmental conditions.
Chlorine Materials	**Producer Comments:** Equipment sanitation and possible use for treatment of water sources. Best practices for equipment sanitation involve two opposite approaches to preventing biofilm formation. If Chlorine is taken away then a powerful, and well researched, method of eliminating pathogens on food contact surfaces will severely increase food safety risks to the consumer. **Producer Comments:** We use Chlorine Dioxide to maintain the irrigation lines clean of plant pathogens and biofilm, which could plug irrigation emitters. Allowed alternative is hydrogen peroxide, which is less effective. That way, we would need more quantity to obtain the same effect and also presents faster degradation when is in contact with organic matter. **Producer Comments:** Used to disinfect irrigation lines and tools, collection buckets and berry cleaning equipment as well as refrigerators where berries are stored for consumer sales. There are a limited number of sanitizers available for use at a time when food safety requirements are increasing for farmers. Sanitizers are not interchangeable. Some work better in wet, hot environments others work better in cold. We need every tool. **Producer Comments:** We use chlorine in post-harvest wash water. There are very few organic-compliant sanitizers available, which can be used for direct food-contact. The sanitizers that are available for use, like chlorine and PAA, are critical for proper food safety. **Producer Comments:** Sanitation at harvest, for harv. machine sanitation, and in processing plant for sanitation of wash water. Very few organic alternatives, but industry needs to be open to new science **Producer Comments:** It is used in 4% solution to clean drip lines of organics. It is used in

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	food safety to disinfect packing lines. This is by far the most effective and affordable product available.
Micronutrients	**Producer Comments:** Micronutrients are crucial to plants well-being and growth. We are adjust plant levels by constantly monitoring lab analysis. Micronutrients are applied by foliar sprays, irrigation systems and directly into the soil. There no other alternatives at this moment. **Producer Comments:** Micronutrients are important in plant health and plant physiological functions. No alternatives. **Producer Comments:** Zinc sulfate applications reduce the cadmium uptake into leafy greens, specifically spinach. We use zinc sulfate in very specific regions where we have soil high in cadmium. Cadmium uptake is a concern in leafy greens, specifically spinach. We try not to grow spinach in regions where cadmium is high, but our soil quality is sometime limited. There are few other tools available to reduce cadmium uptake.
Herbicides, soap-based	**Producer Comments:** Soap-based herbicides are important tools in our integrated pest management program. When preventative, mechanical, and physical measures fail to prevent pests, soap-based herbicides are sometimes necessary for weed control. While there are other herbicides available, the applications are not always appropriate depending on the crop type, soil quality, and other environmental factors. As an organic grower, we're already limited in the pest management tools available to us.

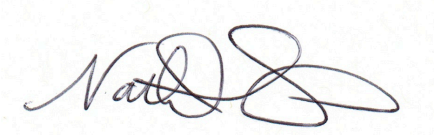
Synthetic Substances Allowed for Use in Organic Livestock Production (§ 205.603)

Copper Sulfate	**Producer Comment:** Topical treatment used in a manner that minimizes accumulation in soil. No effective alternatives on the national list.
Glucose	**Producer Comments:** Used as a medical treatment. No alternatives currently allowed.
Lidocaine	**Producer Comments:** Pain management, critical for animal welfare. No alternatives.
Tolazine	**Producer Comments**: Used for pain management, critical for animal welfare. No alternatives.
Chlorine Materials	**Producer Comments:** Sodium hypochlorite is routinely used to sanitize many surfaces to kill pathogenic microorganisms. Chlorine dioxide is routinely used to kill pathogenic microorganisms in water lines because sodium hypochlorite is corrosive to the pipes. No alternatives currently allowed.

In closing, we thank the Board for its time and commitment. OTA is committed to collecting information from our broad membership and beyond in order to assist NOSB in determining whether or not a substance on the National List remains essential to 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,



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cc: Laura Batcha
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