October 21, 2016

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-16-0049

RE: Crops Subcommittee – 2018 Sunset Summaries for Crops

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board (NOSB) on its 2018 Sunset Review for synthetic substances allowed for use in organic crop production and non-synthetic substances prohibited 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 carefully considering each crops input scheduled to sunset in 2018. It's critical that NOSB hear from certified producers on whether these inputs are consistent with and necessary for organic crop production, or whether there are other effective natural or organic alternatives available.

OTA is submitting results to our electronic surveys that were created for each input under review for 2018. 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 October 21, 2016. We have received the following total responses:

- § 205.601 Synthetic Allowed: 16
- § 205.602 Non-synthetic prohibited: 0
- **Total: 16**

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 essential to 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 essentiality criteria listed above. We have clearly noted if we have not yet received feedback on a particular substance. 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) & Non-synthetic Substances Prohibited for Use in Organic Crop Production (§ 205.602)

Substance	Survey Information
Copper Sulfate	**Producer Comments:** Utilized in early season for algae and/or tadple shrimp control. No other acceptable organic alternatives for control. The only other option would be to completely drain the fields. This would be destructive to our early season weed management, as it would allow numerous species of grass weeds to germinate, and they would over-run and completely out-compete with the planted rice. A last-ditch option would force the entire organic rice industry to go to a drill-seeded cultural system, which has been proven to be less successful in organic weed control than the current water seeded system **Producer Comments:** Rotated with other foliar fungicides to manage late blight, early blight, altermaria, pseudocercospora, and other foliar fungal plant diseases that develop under wet conditions. Availability and efficacy are similar for copper sulfate, micronized sulfur and potassium bicarbonate. Alternating materials is critical to prevent resistance from developing. Materials used when leaves are wet from dew or rains to prevent the development of various foliar fungal diseases. **Producer Comments:** It's used as fungicide and bactericide, is necessary to fight diseases such as early and late blight and alternaria solani, and to correct copper deficiencies. Other options don't have equal effectiveness than copper sulfate as long they are non systemic, which means that is not absorbed by the through the foliage or roots. On the other hand, a systemic substance as we can get copper sulfate can be

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	curative or can eradicate infections only hours or days old in less applications. This product on a scale of 1 to 10 is rated 10 for necessity. **Producer Comments:** Fungicide on fruiting crops particularly tomato. There are many fungicides on the market listed for organic vegetable production but none of them have the efficacy of copper. I would not grow organic tomatoes in my region without copper under any circumstances. I have tried in the past and experienced numerous crop failure before I started with regular copper sprays. This product on a scale of 1 to 10 is rated 10 for necessity. **Producer Comments:** It is the only substance I have found for lychee leaf blight. seems to cure it, and not require reapplication after blight is gone. It is commonly available, and I have found no alternative. This product on a scale of 1 to 10 is rated 10 for necessity. **Producer Comments:** Producing 17 acres of organic tomatoes on the West Coast. Copper sulfate is used for crop pest (i.e. alternaria solani), and disease control (i.e. antifungal treatment), besides correcting copper deficiencies. Other options don't have equal effectiveness than copper sulfate as long they are non systemic, which means that is not absorbed by the through the foliage or roots. On the other hand, a systemic substance as we can get copper sulfate can be curative or can eradicate infections only hours or days old in less applications. Agronomic effects (effects to health of crops) if this material were removed: copper deficiencies and diseases damages could not be prevented on leaf. This product on a scale of 1 to 10 is rated 10 for necessity.
Ozone Gas	**Producer Comments:** To disinfect all reclaim irrigation water to be reused to irrigate tomato plants. without disinfection we could spread diseases trough crops. Ozone is produce in site, residue is oxygen. Alternatives are ClO2, Paracetic acid, Cl. This product on scale of 1 to 10 is rated 5 for necessity. **Producer Comments:** We use it to disinfect our irrigation water. All the water the tomato plants do not use is recollected and stored, then it is treated with ozone to get ride of pathogens in the water. Once treated,the irrigation water is re-used to irrigate our crops. None [alternatives]. This product on a scale of 1 to 10 is rated 10 for necessity. **Producer Comments:** Ozone is used to clean and oxygenate that water the plants are grown in. It is the most efficient and sustainable practice of cleaning and oxygenating water. Other cleaning options require more maintenance, more resources, and are more costly to run. Ozonation uses minimal energy but produces two necessary cultural processes for the plants. Water disinfection and Oxygenation. This product on a scale of 1 to 10 is rated 10 for necessity. **Producer Comments:** All our water is recycled and gets disinfected with ozone. This gives also a higher oxygen level in the water that benefits the plants. Ozone is the best natural substance to disinfect water. Other materials are available but chemical and bad for the enviroment Ozone has a short shelf life and reverts back to oxygen. This product on a scale of 1 to 10 is rated 10 for necessity. **Producer Comments:** Invigorates plant roots, cleans irrigation lines, potentially helps with soil diseases. None...there's no replacement for oxygen. Ozone is oxygen with an extra oxygen atom (O3 instead of O2). This makes it more reactive. This product on a scale of 1 to 10 is rated 10 for necessity.
Peracetic Acid	**Producer Comments:** Sanitizing fruit in packing shed. No alternative except chlorine

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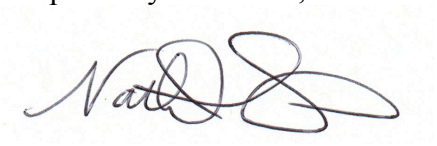
	Producer Comments: To disinfect harvesting tools, crop equipment and greenhouses inside structures to prevent diseases transmission from harvesting to crop equipment, such diseases include: clavibacter michiganensis, botrytis, tomato mosaic virus, and others. Other disinfection options are unstable and rapid degradation. This product on a scale of 1 to 10 is rated 10 for necessity. **Producer Comments:** We use peracetic acid as a sanitizer on all of our harvest and field equipment. It is also in the hydrogen peroxide solution we use in our irrigation system. There are other sanitizers on 601. However PAA has a broad-spectrum impact on microorganisms and a higher oxidation potential (i.e. is more effective) than hydrogen peroxide and chlorine sanitizers. This product on a scale of 1 to 10 is rated 10 for necessity. **Producer Comments:** It is used in sanitation of our processing equipment. None [alternatives] that I know of. This product on a scale of 1 to 10 is rated 9 for necessity.
EPA List 3 – Inerts of Unknown Toxicity	**Producer Comments:** All of our materials are OMRI approved, many of which contain inerts. However, OMRI does not specify whether the inerts are EPA List 3 or 4 inerts. There are very few effective materials that do not contain inerts. This product on a scale of 1 to 10 is rated 6 for necessity.
Calcium Chloride	**No Survey Responses Received**

Conclusion

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.

Again, 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,



Nathaniel Lewis
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association

Appendix A – Survey Questions

1. Please describe the types of crops produced on your operation:

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2. How many acres do you have under organic management?

3. Where is your organic production located (state, region, country, etc):

4. With what frequency does your operation use this substance?

5. Describe how this substance is used in your operation and why it is necessary.

6. Describe the availability and efficacy of allowed alternatives for this substance:

7. Describe the effects to your operation should you no longer be allowed to use this subsance:

Agronomic effects (effects to health of crops):

Environmental effects (effects to environment if the substance was no longer allowed AND effects to environment from potential alternatives):

Economic effects (effects to economic health of your operation):

8. Based on your answers to the questions above, rate the essentiality of this substance (i.e. how necessary is this substance to the continued success of your organic products and operation?):

1 Less Essential	2	3	4	5 More Essential	6	7	8	9	10 Critical

9. Does your company intend on submitting comments directly to NOSB regarding the sunset review of this substance?

If you would like assistance or guidance in submitting comments to NOSB, please provide your email address, and OTA staff will contact you directly:

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