



October 11, 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-17-0024

**RE: Livestock Subcommittee – Petitioned Substances: Sulfur and Hypochlorous Acid (Proposal)**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Livestock Subcommittee’s Proposal on two petitioned substances: Sulfur and Hypochlorous Acid.

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.

### **Sulfur**

The Organic Trade Association supports the Livestock Subcommittee’s proposal to add Sulfur to the National List at 7 CFR 205.603 for use as an external parasiticide in organic livestock and poultry production. OTA understands that alternative external pest control materials available either are limited only to dairy animals (fenbendazole, moxidectin, and ivermectin) or have limited efficacy against lice and mites (hydrated lime, mineral oil, and diatomaceous earth). OTA egg producer members have voiced their support for allowing sulfur to be used to control parasites, as they indicate there are no effective alternatives when faced with external parasites. OTA’s broiler producer members indicate that parasites are currently not a major issue mostly due to the shorter production cycles typical in broiler production. However, as these producers look toward slower growing breeds to satisfy consumer demand, they indicate that having an effective tool against mites, ticks, and lice could be necessary. Lastly, OTA notes that elemental sulfur is a currently FDA/AAFCO approved feed additive that can be included in organic livestock and poultry rations. **Based on feedback from our membership, the current allowances for sulfur in organic crop and livestock production, and the lack of effective alternatives for organic meat and egg producers, the Organic Trade Association supports LS proposal to add sulfur to the National List at 7 CFR 205.603.**


### **Hypochlorous Acid**

OTA supports the majority of the LS *not* to add Hypochlorous Acid to the National List at 7 CFR 205.603 as a medical treatment, specifically for treating wounds and pinkeye. We agree that there are multiple alternative materials available for treatment of wounds and pinkeye. Additionally, we recognize that

other chlorine materials (chlorine dioxide, sodium hypochlorite, and calcium hypochlorite) are currently only allowed for use in disinfecting and sanitizing facilities and equipment on organic livestock operations, and the petitioner did not adequately justify why this form of chlorine should be allowed for use directly on organic livestock to disinfect wounds and treat pinkeye. **Due to the availability of alternative materials and the lack of necessity for hypochlorous acid as a medical treatment, we support LS recommendation *not* to add Hypochlorous Acid to the National List.**

On behalf of our members across the supply chain and the country, the Organic Trade Association thanks the National Organic Standards Board 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