



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: Livestock Subcommittee – Petitioned Materials: Acid Activated Bentonite, Aluminum Sulfate, and Sodium Bisulfate

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Livestock Subcommittee's (LS) proposals on three substances petitioned for inclusion on the National List for organic livestock production: Acid Activated Bentonite, Aluminum Sulfate, and Sodium Bisulfate.

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 organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

The function on these three bedding amendments is to reduce the volatilization of nitrogen in the form of ammonia from the litter, which improves air quality in houses. The management practices outlined by the LS that producers are currently employing to reduce ammonia levels in barns (ventilation, monitoring moisture, and regular additions of new bedding) appear to be adequate. Additionally, organic producers can use approved non-synthetic alternative amendments to accomplish similar ammonia reduction in barns.

OTA **does not support** the addition of these three substances to the National List. We agree with the conclusions of the LS that alternative practices and non-synthetic amendments exist to manage for ammonia in poultry and livestock houses, and that synthetic bedding amendments fail to meet all the National List criteria set forth by the Organic Foods Production Act (OFPA, 6517 and 6518) and the organic regulations (205.600). Specifically, these synthetic bedding amendments are not necessary to 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,



Nathaniel Lewis
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association